

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

\_\_\_\_\_  
XI CHIN CLAN NATION

P.O. Box 6666

Woodbridge, Virginia [22195]

HARMON RHASHEA LYNN

FOREIGN TRUST

P.O. Box 7446

Philadelphia, Pennsylvania 19101

RHASHEA LYNN HARMON 'EL,

ESQ. d/b/a JURIS CONSUL and

TRUSTEE

P.O. Box 7446

Philadelphia, Pennsylvania 19101

GUALE YAMASSEEE JURIS

CONSUL OFFICE

P.O. Box 19835

Philadelphia, Pennsylvania 19143

THE BE KIND AND UNIFIED

FOREIGN PRIVATE FAMILY

INDIGENOUS TRUST

1361 S. 46<sup>th</sup> Street

Philadelphia, Pennsylvania 19143

THE INDIGENOUS LAW CENTER

1361 S. 46<sup>th</sup> Street

Philadelphia, Pennsylvania 19143

RLH MAAT LAW OFFICE

P.O. Box 7446

Philadelphia, Pennsylvania 19101

GUALE YAMASSEEE

COMPLIANCE DEPARTMENT

P.O. Box 19835

Philadelphia, Pennsylvania 19143

Petitioners,

vs.

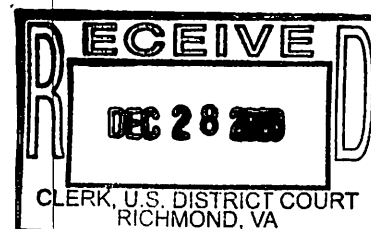
\_\_\_\_\_  
QUEEN ELIZABETH

d/b/a SOVEREIGN of ENGLAND

and Individually

CIVIL ACTION

DOCKET NO. 3:20cv006



IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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Buckingham Palace  
London, SW1A 1AA

-and-

PENNSYLVANIA BAR  
ASSOCIATION  
100 South Street  
Harrisburg, Pennsylvania [17101]

-and-

VIRGINIA BAR ASSOCIATION  
1111 E. Main St., Suite 700,  
Richmond, Virginia [23219]

-and-

NEW JERSEY STATE BAR  
ASSOCIATION  
1 Constitution Square,  
New Brunswick, New Jersey [08901]

-and-

MASSACHUSETTS BAR  
ASSOCIATION  
20 West Street  
Boston, Massachusetts [02111-1204]

-and-

THE SUPREME COURT OF  
PENNSYLVANIA EASTERN  
DISTRICT  
468 City Hall  
Philadelphia, Pennsylvania [19107]

-and-

LISETTE SHIRDAN-HARRIS  
d/b/a Judge and Agent of United  
States Attorney Account ID# 61204  
and Individually  
Court of Common Pleas  
692 City Hall

---

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

Philadelphia, Pennsylvania [19107]

-and-

CAMILLE T. BARRY, d/b/a  
NOTARY and BEEREN & BARRY  
INVESTMENTS, LLC, and  
Individually  
11654 Plaza America Drive, Suite 653  
Reston, Virginia [20190]

-and-

BRANCH BANKING AND TRUST  
CORPORATION (NYSE:BB&T)  
200 West Second Street  
Winston Salem, North Carolina  
[27101]

-and-

COMMONWEALTH OF VIRGINIA  
Ralph Northam,  
d/b/a GOVERNOR OF VIRGINIA  
and Individually  
c/o OFFICE OF THE SECRETARY  
OF THE COMMONWEALTH  
SERVICE OF PROCESS  
DEPARTMENT  
P.O. BOX 2452  
Richmond, Virginia [23218-2452]

-and-

SECRETARY OF THE  
COMMONWEALTH OF VIRGINIA  
P.O. Box 1795  
Richmond, Virginia [23218-1795]

-and-

SAMUEL I. WHITE, P.C.  
5040 Corporate Woods Drive,  
Suite 120  
Virginia Beach, Virginia [23462]

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

PENNSYLVANIA OFFICE OF  
ATTORNEY GENERAL  
Josh Shapiro, d/b/a  
ATTORNEY GENERAL OF  
PENNSYLVANIA and Individually  
393 Walnut Street  
Harrisburg, Pennsylvania [17120]

-and-

COMMONWEALTH OF  
PENNSYLVANIA  
Tom Wolf  
d/b/a GOVERNOR OF  
PENNSYLVANIA and Individually  
Main Capital, Room 225  
Harrisburg, Pennsylvania  
Commonwealth, [17120]

-and-

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY  
AOPC  
1515 Market Street  
Philadelphia, Pennsylvania [19102]

-and-

PHILADELPHIA COUNTY, CITY  
OF PHILADELPHIA  
Jim F. Kenney  
d/b/a MAYOR OF THE CITY OF  
PHILADELPHIA and Individually  
City Hall, Room 115  
Philadelphia, Pennsylvania [19107]

-and-

DARRELL CLARK  
d/b/a CITY OF PHILADELPHIA  
COUNCIL PRESIDENT and  
Individually  
City Hall, Room 494

---

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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Philadelphia, Pennsylvania [19107]

-and-

E & E FINANCIAL, INC. D/B/A  
EDGE MORTGAGE SERVICES, and  
EUGENE BEDERMAN, Individually  
2337 Philmont Avenue, Suite 104A  
Huntingdon Valley, Pennsylvania  
[19006]

-and-

MARK SQUILLA  
d/b/a DEPUTY MAJORITY WHIP  
and Individually  
City Hall, Room 332  
Philadelphia, Pennsylvania [19107]

-and-

KENYATTA JOHNSON  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 580  
Philadelphia, Pennsylvania [19107]

-and-

JAMIE GAUTIER  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 586  
Philadelphia, Pennsylvania [19107]

-and-

CURTIS JONES JR.  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MAJORITY WHIP and  
Individually  
City Hall, Room 404  
Philadelphia, Pennsylvania [19107]

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

-and-

BOBBY HENON  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 484  
Philadelphia, Pennsylvania [19107]

-and-

MARIA D. QUINONES SANCHEZ  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 508  
Philadelphia, Pennsylvania [19107]

-and-

CINDY BASS  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 312  
Philadelphia, Pennsylvania [19107]

-and-

CHERELLE PARKER  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 577/584  
Philadelphia, Pennsylvania [19107]

-and-

BRIAN J. O'NEILL  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER and  
Individually  
City Hall, Room 562  
Philadelphia, Pennsylvania [19107]

---

-and-

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

KENDRA BROOKS  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 408  
Philadelphia, Pennsylvania [19107]

-and-

ALLAN DOMB  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 316  
Philadelphia, Pennsylvania [19107]

-and-

DEREK GREEN  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 594  
Philadelphia, Pennsylvania [19107]

-and-

KATHERINE GILMORE  
RICHARDSON  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 581  
Philadelphia, Pennsylvania [19107]

-and-

HELEN GYM  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 592  
Philadelphia, Pennsylvania [19107]

---

-and-

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

DAVID OH  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 319  
Philadelphia, Pennsylvania [19107]

-and-

ISAIAH THOMAS  
d/b/a CITY OF PHILADELPHIA  
COUNCIL MEMBER AT LARGE  
and Individually  
City Hall, Room 330  
Philadelphia, Pennsylvania [19107]

-and-

TRAVELERS INSURANCE  
AGENCY  
One Tower Square  
Hartford, Connecticut [06183]

-and-

HARRY J. PARRISH II  
d/b/a MAYOR AND CITY  
COUNCIL OF MANASSES  
VIRGINIA and Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

PAMELA J. SABESKY  
d/b/a VICE MAYOR OF  
MANASSAS and Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

MICHELLE DAVIS-YOUNGER  
d/b/a CITY COUNCIL MEMBER and  
Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

THERESA COATES-ELLIS  
d/b/a CITY COUNCIL MEMBER and  
Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

IAN LOVEJOY  
d/b/a CITY COUNCIL MEMBER and  
Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

MARK D. WOLFE  
d/b/a CITY COUNCIL MEMBER and  
Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

RALPH D. SMITH  
d/b/a CITY COUNCIL MEMBER and  
Individually  
9027 Center Street  
Manassas, Virginia [20110]

-and-

MATRIX FINANCIAL SERVICES  
CORPORATION,  
5151 CORPORATION DRIVE  
Troy, Michigan [48098]

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

JAMES K. CIROLI,  
d/b/a Vice President and Chief  
Executive Officer of FLAGSTAR  
BANK, and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

LEE MATTHEW SMITH, d/b/a  
Executive Vice President and Chief  
Operating Officer of FLAGSTAR  
BANK, and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

KRISTY WILLIAMS FARCHO  
d/b/a Vice President & President of  
Mortgage of FLAGSTAR BANK, and  
Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

DAVID L. URBAN  
d/b/a Vice President & Director of  
Investor Relations of FLAGSTAR,  
and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

CHRIS BEATLEY d/b/a  
BEEREN & BARRY  
INVESTMENTS, LLC and  
Individually  
11654 Plaza America Drive # 653  
Preston, Virginia [20190]

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-and-

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

EUGENE BEDERMAN  
d/b/a Attorney  
2727 Philmont Avenue, Suite 122  
Huntingdon Valley, Pennsylvania  
[19006]  
**Montgomery County**

-and-

PENNSYLVANIA DEPARTMENT  
OF BANKING AND SECURITIES  
Market Square Plaza  
17 North 2<sup>nd</sup> Street, Suite 1300  
Harrisburg, Pennsylvania [17101]

-and-

CONSUMER FINANCIAL  
PROTECTION BUREAU (CFPB)  
1700 G St NW, Washington, DC  
[20552]

-and-

VANESSA ELLISON  
d/b/a LOAN ADMINISTRATION  
ANALYST and AGENT OF  
FLAGSTAR BANK and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

ALESSANDRO P. DINELLO  
d/b/a PRESIDENT AND CEO &  
DIRECTOR of  
FLAGSTAR BANK(FSB) and  
Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

-and-

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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PENNSYLVANIA HUMAN  
RELATIONS COMMISSION  
Philadelphia Regional Office  
10 N. 8<sup>th</sup> Street, Suite 501  
Philadelphia, Pennsylvania [19107]

-and-

OFFICE OF THE SHERIFF  
CITY and COUNTY of  
PHILADELPHIA  
-Allative Agents-  
LAND TITLE BUILDING  
100 S. Broad Street, 5<sup>th</sup> Floor  
Philadelphia, Pennsylvania [19110]

-and-

COMMONWEALTH LAND TITLE  
INSURANCE COMPANY  
601 Riverside Avenue  
Jacksonville, Florida [32204]

-and-

FIDELITY NATIONAL  
FINANCIAL, INC.  
Corporation Trust Center  
1209 Orange Street  
New Castle, Delaware [19801]

-and-

CONTINENTAL MUTUAL  
INSURANCE COMPANY  
8049 West Chester Pike  
Upper Darby, Pennsylvania [19083]

-and-

ASI INSURANCE COMPANY  
2 ASI Way  
St. Petersburg, Florida [33702]

-and-

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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THE FIRST JUDICIAL DISTRICT  
OF PENNSYLVANIA, OFFICE OF  
JUDICIAL RECORDS FOR FILING  
(AGENTS and AGENCIES)  
Room 284, City Hall  
PHILADELPHIA, PENNSYLVANIA  
COMMONWEALTH [19107]

-and-

PHELAN, HALLINAN DIAMOND  
& JONES, LLP  
1617 JFK BOULEVARD, SUITE  
1400  
ONE PENN CENTER PLAZA  
PHILADELPHIA, PA [19103]

-and-

MICHAEL A. PELLEGRINO,  
d/b/a Attorney Account ID 322412  
and Individually  
PHELAN HALLLINAN DIAMOND  
& JONES  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, Pennsylvania [19103]

-and-

MICHAEL G. MCCABE d/b/a  
Attorney and Agent of GRB LAW  
GROUP, and Individually  
1425 Spruce Street, Suite 100  
Philadelphia, Pennsylvania [19102]

-and-

GERALD J. POMERANTZ &  
ASSOCIATES  
21 S. 12th Street, 7<sup>th</sup> Floor  
Philadelphia, Pennsylvania [19107]

-and-

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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DIVERSIFIED COMMUNITY  
SERVICES  
DIXON HOUSE  
1920 South 20<sup>th</sup> Street  
Philadelphia, Pennsylvania [19145]

-and-

LINDA CARPENTER, d/b/a Judge  
for PHILADELPHIA COURT OF  
COMMON PLEAS and Individually  
1418 Criminal Justice Center,  
Philadelphia, Pennsylvania [19107]

-and-

FANTA SANOE  
6829 Guyer Avenue  
Philadelphia, Pennsylvania [19142]

-and-

IDEE C. FOX  
d/b/a JUDGE FOR THE COURT OF  
COMMON PLEAS and Individually  
656 City Hall  
Philadelphia, Pennsylvania [19107]

-and-

NIS-LAR LLC, and  
GUY LAREN d/b/a DEVELOPER  
and INDIVIDUALLY  
4323 Spruce Street  
Philadelphia, Pennsylvania [19104]

-and-

YELENA SNIGUR  
d/b/a NOTARY PUBLIC IN  
PENNSYLVANIA and  
INDIVIDUALLY  
c/o PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF COMMISSIONS  
Capital Park

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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401 North Street  
Harrisburg, Pennsylvania [17101]

-and-

BANK OF NEW YORK MELLON  
Thomas P. Gibbons, d/b/a VICE  
CHAIR AND CHIEF FINANCIAL  
OFFICER and  
Robert Kelly and as INDIVIDUALS  
225 Liberty Place  
New York, NY 10286

-and-

BANK OF AMERICA  
100 N. Tryon Street  
Charlotte, North Carolina [28255]

-and-

DITECH FINANCIAL LLC  
3000 Bayport Drive  
1100 Tampa, Florida [33607]

-and-

BAYVIEW LOAN SERVICING  
4425 Ponce De Leon Boulevard  
5<sup>th</sup> Floor  
Coral Gables, Florida [33146]

-and-

WORCESTER COUNTY  
SHERIFF'S OFFICE and AGENTS  
240 Main Street  
Worcester, Massachusetts [01608]

-and-

LEWIS G. EVANGELIDIS  
d/b/a SHERIFF OF WORCESTER  
COUNTY and  
INDIVIDUALLY  
240 Main Street

---

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

Worcester, Massachusetts [01608]

-and-

WORCHESTER COUNTY CITY  
COUNCIL  
City Hall Room 206  
455 Main Street  
Worcester, Massachusetts [01608]

-and-

JOSEPH M. PETTY  
d/b/a MAYOR OF WORCHESTER  
COUNTY and COUNCILOR-AT-  
LARGE and  
INDIVIDUALLY  
2 Grove Heights Drive  
Worcester, Massachusetts [01605]

-and-

MORRIS A. BERGMAN  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
11 Kensington Heights  
Worcester, Massachusetts [01602]

-and-

DONNA M. COLORIO  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
10 Homer Street  
Worcester, Massachusetts [01602]

-and-

KHRYSTIAN E. KING  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
9 Victoria Avenue  
Worcester, Massachusetts [01607]

---

-and-



IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

GARY ROSEN  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
11 Herbert Road  
Worcester, Massachusetts [01602]

-and-

KATHLEEN M. TOOMEY  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
50 Ideal Road  
Worcester, Massachusetts [01604]

-and-

SEAN M. ROSE  
d/b/a DISTRICT 1 COUNCILOR and  
INDIVIDUALLY  
14 Dubiel Drive  
Worcester, Massachusetts [01609]

-and-

CANDY F. MERO-CARLSON  
d/b/a DISTRICT 2 COUNCILOR and  
INDIVIDUALLY  
42 Benedict Road  
Worcester, Massachusetts [01604]

-and-

GEORGE J. RUSSELL  
d/b/a DISTRICT 3 COUNCILOR and  
INDIVIDUALLY  
30 Dolly Drive  
Worcester, Massachusetts [01604]

-and-

SARAI RIVERA  
d/b/a DISTRICT 4 COUNCILOR and  
INDIVIDUALLY  
7 Lucien Street  
Worcester, Massachusetts [01603]

---

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

JAMES P. LEONARD  
d/b/a ATTORNEY AND  
COMMISSIONER and  
INDIVIDUALLY  
DEPARTMENT OF RECORDS  
160 City Hall  
Philadelphia, Pennsylvania [19107]

-and-

MATTHEW E. WALLY  
d/b/a DISTRICT 5 COUNCILOR and  
INDIVIDUALLY  
61 Berwick Street  
Worcester, Massachusetts [01602]

-and-

MCCARTER & ENGLISH LLP  
265 Franklin Street  
Boston, Massachusetts [02110-3113]

-and-

WILLIAM FRANCIS GALVIN, d/b/a  
SECRETARY OF THE  
COMMONWEALTH OF  
MASSACHUSETTS and Individually  
McCormack Building,  
One Ashburton Place, Room 1611  
Boston, Massachusetts [02108]

-and-

BENJAMIN M. GREENE  
d/b/a Attorney and  
INDIVIDUALLY  
265 Franklin Street  
Boston, Massachusetts [02110]

---

-and-

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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DEPARTMENT OF HOUSING AND  
URBAN DEVELOPMENT C& L  
GROUP  
2488 E. 81<sup>st</sup> Street, Suite 700  
Tulsa, Oklahoma [74137]

-and-

DANIEL WICKEY  
agent of HOMEBRIDGE  
FINANCIAL SERVICES, INC., and  
INDIVIDUALLY  
194 Wood Avenue South, 9<sup>th</sup> Floor  
Iselin, New Jersey [08830]

-and-

ANTHONY N. RENZI d/b/a  
WALTER INESTMENT  
MANAGEMENT CORP., and  
Gary L. Tillett, d/b/a as CHIEF  
FINANCIAL OFFICER OF  
WALTER INVESTMENT  
MANAGEMENT CORPORATION  
and as INDIVIDUALS  
3000 Bayport Drive, Suite 1100  
Tampa, Florida [33607]

-and-

OFFICE of ATTORNEY GENERAL  
Maura Healy,  
d/b/a ATTORNEY GENERAL OF  
MASSACHUSETTS and  
INDIVIDUALLY  
1 Ashburton Place  
Boston, Massachusetts [02108]

-and-

COMMONWEALTH OF  
MASSACHUSETTS  
Charlie Baker,  
d/b/a GOVERNOR OF  
MASSACHUSETTS and

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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INDIVIDUALLY

c/o Massachusetts State House  
Beacon Street, #280  
Boston, Massachusetts [12133]

-and-

KORDE & ASSOCIATES, P.C.  
Timothy French d/b/a ATTORNEY  
and INDIVIDUALLY  
900 Chelmsford Street, Suite 3102  
Lowell, Massachusetts [01851]

-and-

OFFICE OF CONSUMER AFFAIRS  
AND BUSINESS REGULATION  
Agent JOHN C. CHAPMAN  
501 Boylston Street #5100  
Boston, Massachusetts [02116]

-and-

MICHAEL BOMSTEIN,  
d/b/a Attorney Account ID# 21328  
and INDIVIDUALLY  
PINNOLA & BOMSTEIN  
100 S. Broad Street, Suite 2126  
Philadelphia, Pennsylvania [19110]

-and-

STRADLEY RONON STEVENS &  
YOUNG LLP  
2005 Market Street, Suite 2600  
Philadelphia, Pennsylvania [19103]

-and-

ANDREW K. STUTZMAN  
d/b/a Attorney Account ID# 72922  
and INDIVIDUALLY  
STRADLEY RONON STEVENS &  
YOUNG, LLP  
2005 Market Street, Suite 2600  
Philadelphia, Pennsylvania [19103]

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

VLADIMIR V. PALMA  
d/b/a Attorney Account#87046 and  
INDIVIDUALLY  
754 Dartmoor Avenue  
Williamstown, New Jersey [08094]

-and-

DAVID ANDREW CRAMER  
d/b/a Attorney Account ID# 307873  
and INDIVIDUALLY  
SUNDARSINGH LAW  
4440 PGA BLVD Suite 502  
Palm Beach Gardens, Florida [43216]

-and-

BRANDON ROBERT GAMBLE  
d/b/a Attorney Account ID# 94788  
and INDIVIDUALLY  
U.S. LIABILITY INSURANCE CO.  
1190 Devon Park Drive  
Wayne, Pennsylvania [19087]

-and-

UNITED STATES LIABILITY  
INSURANCE COMPANY (USLI)  
1190 Devon Park Drive  
Wayne, Pennsylvania [19087]

-and-

ABIGAIL BRANIGAN BRUNNER  
d/b/a Attorney Account ID#319034  
and INDIVIDUALLY  
402 Boucke Building  
University Park, Pennsylvania [16802]

-and-

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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UNIVERSITY OF  
PENNSYLVANIA  
AMY GUTMANN, d/b/a  
PRESIDENT of the UNIVERSITY  
OF PENNSYLVANIA and  
INDIVIDUALLY  
1 College Hall, Room 100  
Philadelphia, Pennsylvania [19104]

-and-

UNIVERSITY OF THE SCIENCES  
IN PHILADELPHIA  
PAUL KATZ, d/b/a PRESIDENT of  
UNIVERSITY OF THE SCIENCES  
IN PHILADELPHIA and  
INDIVIDUALLY  
600 S 43<sup>rd</sup> Street  
Philadelphia, Pennsylvania [19104]

-and-

PREMIER TITLE COMPANY  
8245 Boone Boulevard,  
Suite 410  
Tysons, Virginia [22182]

-and-

JENNIE SHNAYDER  
d/b/a Attorney Account ID#315213  
and INDIVIDUALLY  
LAW OFFICES OF DAMIAN G.  
WALDMAN  
148 East Street Road, Suite 352  
Feasterville, Pennsylvania [19053]

-and-

DAMIAN G. WALDMAN d/b/a  
Attorney and INDIVIDUALLY  
LAW OFFICES OF DAMIAN G.  
WALDMAN  
148 East Street Road, Suite 352  
Feasterville, Pennsylvania [19053]

---

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

---

-and-

PETER WILLIAM WAPNER  
d/b/a Attorney Account ID# 318263  
and INDIVIDUALLY  
PHELAN HALLINAN DIAMOND &  
JONES, LLP  
1617 JFK BLVD STE 1400  
Philadelphia, Pennsylvania [19103]

-and-

FIRST JUDICIAL DISTRICT OF  
PENNSYLVANIA THE  
PHILADELPHIA COURTS  
LANDLORD TENANT COURT  
-All Agents and as INDIVIDUALS  
1339 Chestnut Street, Room 1020  
Philadelphia, Pennsylvania [19107]

-and--

INTERNAL REVENUE SERVICE  
3320 Noble Pond Way  
Woodbridge, Virginia [22193]

-and-

FEDERAL DEPOSIT INSURANCE  
CORPORATION  
550 17<sup>TH</sup> Street N.W.  
Washington, District of Columbia  
[20429]

-and-

KRIK LAW  
Justin L. Krik, d/b/a Attorney at Law  
Attorney Account: 203006 and  
INDIVIDUALLY  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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-and-

NEW YORK STATE BAR  
ASSOCIATION  
1 ELK STREET  
ALBANY, NEW YORK [12207]

-and-

CITY OF PHILADELPHIA  
Office of Housing and Community  
Development  
1234 Market Street, 17<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19107

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Respondents.

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**INDIGENOUS TRUSTEES VERIFIED COMPLAINT IN CIVIL ACTION  
AGAINST AGENTS OF THE UNITED STATES FRAUD AND DEPRIVATION OF  
HUMAN RIGHTS AND CONSTITUTIONAL RIGHTS  
UNDER COLOR OF LAW AND MALFEASANCE**

NOW COMES, INDIGENOUS TRUSTEES, CHIEF WHITE OWL and RHASHEA LYNN HARMON'EL, ESQ., as Trustee, Juris Consul of Guala Yamassee Law Department and Trustee of The Indigenous Law Center and files the herein COMPLAINT and EMERGENCY INJUNCTIVE RELIEF as a FEDERAL CIVIL ACTION, against allative respondents and presents the following:

**LIST OF DEFINITIONS**

- 1) **'Abuse of Process'** means to utilize the legal process by right, but the reasons are to extort or cause deception, injury, harmful, improper, offensive, reproachful acts to be committed with the hope of submission. The legal process is used to accomplish an unlawful purpose by using, presumptively lawful means, such as causing a summons, writ, warrant, mandate, order or any other process to issue from a court order to accomplish a purpose not intended by law.<sup>1</sup>
- 2) **'Bank Fraud'** means engaging in the act of obtaining any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.

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<sup>1</sup> See, <https://legal-dictionary.thefreedictionary.com/abuse+of+process>. (site last visited 12.17.2020).



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- 3) **“Black People”** means a legal racialized classification of people, usually a political and a skin color based category for specific populations with a mid to dark brown complexion.
- 4) **‘Conversion’** means an unauthorized assumption and exercise of the right of ownership over goods or personal chattels belonging to another, to the alteration of their condition or the exclusion of the owner’s rights. Any unauthorized act which deprives an owner of his property permanently or for an indefinite time.
- 5) **‘Crimes Against Humanity’** United Nations Rome Statute Article 7:<sup>2</sup> means any of the following acts when committed as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack:
  - a. Murder;
  - b. Extermination;
  - c. Enslavement;
  - d. Deportation or forcible transfer of population;
  - e. Imprisonment or other severe deprivation of physical liberty in violation of fundamental rules of international law;
  - f. Torture;
  - g. Rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization, or any other form of sexual violence of comparable gravity;
  - h. Persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court;
  - i. Enforced disappearance of persons;
  - j. The crime of apartheid;
  - k. Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health.
- 6) **‘Dignity Rights’** means those rights that are a species of incorporeal hereditaments, which a person may have a property or estate right. The rights inherent include the right to not be mistreated, right to freedom of speech and association, right to live and be treated as a human being.
- 7) **‘Duty’** means a legal or moral obligation that arises from relationships and obligations through laws or private agreements. Duty is obligatory conduct or service. It is a thing that is due from a person; that a person owes another. The obligations of performance, care or observance, which rest upon a person in an official or fiduciary capacity, as the duty of an executor, trustee, manager, public official etc.
- 8) **‘Enforcement’** means the act of putting something such as a law into effect and executing or carrying out the act mandated or commanded.
- 9) **‘Ethnocide’** means the destruction of culture while keeping the people.
- 10) **‘Foreclosure’** means to shut out, to bar, to destroy an equity by terminating all rights of the mortgagor or his grantee in the property covered by the mortgage or the process by which the owner of property is deprived of his interest therein.
- 11) **‘Forgery’** means the act with the intent to defraud or injure anyone or with knowledge that such acts are facilitating a fraud or injury to be perpetrated by anyone by:

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<sup>2</sup> <https://www.un.org/en/genocideprevention/crimes-against-humanity.shtml>. (cite last visited 12.16.2020)

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- a. Altering any writing of another without his authority; or
  - b. Making, completing, executing, authenticating, issuing or transferring any writing so that it purports to be the act of another who did not authorize that act.
- 12) **'Fraud'** means an intentional perversion of the truth for the purpose of inducing another in reliance upon it to part with some valuable thing belonging to him or to surrender a legal right; a false assertion of a material fact; a false representation of a matter of fact, whether by words or by conduct, by false and misleading allegations or by concealment of that which should have been disclosed, which deceives and is intended to deceive another so that he shall act upon it to his legal detriment.<sup>3</sup>
- 13) **'Free, Prior and Informed Consent'** (FPIC) means all people have the right to self-determination and all peoples have the right to pursue their economic, social, cultural development.<sup>4</sup>
- 14) **'Fiduciary Duty'** means the person holding the character of a trustee or a character analogous to that of a trustee, in respect the truth and confidence involved in it and the scrupulous good faith and candor which it requires; the person with such duty, created by the undertaking and thus possesses a duty, a responsibility to the beneficiaries of the trust. A breach of such fiduciary responsibility renders the Trustee liable to the beneficiaries for any damage caused by such breach.<sup>5</sup>
- 15) **'Genocide'** means any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such:
- a. Killing members of the group;
  - b. Causing serious bodily or mental harm to members of the group;
  - c. Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part;
  - d. Imposing measures intended to prevent births within the group;
  - e. Forcibly transferring children of the group to another group.<sup>6</sup>
- 16) **'Human Rights'** means rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.<sup>7</sup>
- 17) **'Implementation'** means to execute; to fill.
- 18) **'Inalienable Rights'** means rights that are incapable of being alienated, surrendered, sold, or transferred.

<sup>3</sup> See, THE PUBLISHER'S EDITORIAL STAFF, *Black's Law Dictionary Special Deluxe 5<sup>th</sup> Edition*, 754 (1979).

<sup>4</sup> See, <https://www.un.org/development/desa/indigenouspeoples/publications/2016/10/free-prior-and-informed-consent-an-indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/> (cite last visited 12.17.2020) Backing FPIC are the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the Convention on Biological Diversity and the International Labour Organization Convention 169, which are the most powerful and comprehensive international instruments recognizing the plights of Indigenous Peoples.

<sup>5</sup> [https://www.law.cornell.edu/wex/fiduciary\\_duty](https://www.law.cornell.edu/wex/fiduciary_duty)

<sup>6</sup> See, <https://www.un.org/en/genocideprevention/genocide.shtml>, (site last visited 12.17.2020) noting, case law has associated intent with the existence of a State or organizational plan or policy.

<sup>7</sup> See, <https://www.un.org/en/sections/issues-depth/human-rights/#:~:text=Human%20rights%20are%20rights%20inherent.and%20education%2C%20and%20many%20more.> (site last visited 12.17.2020).

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- 19) **‘International Human Rights Law’** means obligations which States are bound to respect, protect and fulfill.<sup>8</sup>
- 20) **‘Judge’** means an officer so named in his commission, who presides in some court, a public officer, appointed to preside and to administer the law in a court of justice.<sup>9</sup>
- 21) **‘Judicial Notice’** means the act of which a court in conducting a trial or framing its decision, will of its own motion, or without the production of evidence, recognize the existence and truth of certain facts, having a bearing on the controversy.<sup>10</sup>
- 22) **“Justiciable”** means a matter appropriate for court review.
- 23) **“Justiciable Controversy”** means a controversy in which a claim of right is asserted against one who has an interest contesting it. The term refers to real and substantial controversy which is appropriate for judicial determination as distinguished from dispute or difference of contingent, hypothetical or abstract character.<sup>11</sup>
- 24) **‘Mail Fraud’** means any fraud that uses the united states mail.<sup>12</sup>
- 25) **“Malfeasance”** means intentional conduct that is wrongful or unlawful, especially by officials or public employees.
- 26) **‘Malicious Prosecution’** means initiating a wrongful suit against someone through malicious means or when defendant knows they do not a legal right or standing to bring the claim. One who takes an active part in the initiation, continuation, or procurement of civil proceedings against another is subject to liability to the other for wrongful civil proceedings.<sup>13</sup>
- 27) **“Melanin”** means The pigment that gives human skin, hair, and eyes their color. Dark-skinned people have more melanin in their skin than light-skinned people have. Melanin is produced by cells called melanocytes.<sup>14</sup>
- 28) **‘Racism’** means the marginalization and/or oppression of people of color based on a socially constructed racial hierarchy that privileges white people.
- 29) **‘Racket’** means engaging in an operation to make money illegitimately, implying continuity of behavior.
- 30) **‘Torture’** means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person

<sup>8</sup> See, <https://www.un.org/en/sections/universal-declaration/foundation-international-human-rights-law/>. (site last visited 12.17.2020).

<sup>9</sup> See, THE PUBLISHER’S EDITORIAL STAFF, *Blacks Law Dictionary Special Deluxe 5<sup>th</sup> Edition*, 754 (1979).

<sup>10</sup> See, *FRE201(b) Judicial Notice of Adjudication of facts*... 1) generally known within the territorial jurisdiction of the trial court, or 2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.”

<sup>11</sup> *Id.* at THE PUBLISHER’S EDITORIAL STAFF, *Blacks Law Dictionary Special Deluxe 5<sup>th</sup> Edition*, 777 (1979).

<sup>12</sup> See, <https://www.uspis.gov/tips-prevention/mail-fraud/>. (site last visited 12.17.2020)

<sup>13</sup> See, THE PUBLISHER’S EDITORIAL STAFF, *Black’s Law Dictionary Special Deluxe 5<sup>th</sup> Edition*, 864 (1979).

<sup>14</sup> <https://www.medicinenet.com/melanin/definition.htm>

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acting in an official capacity. It does not include pain or suffering arising only from, inherent in or incidental to lawful sanctions.<sup>15</sup>

- 31) **'Trespass'** means an unlawful interference with one's person, property, or right.
- 32) **'Trust'** means a right of property, real or personal, held by one party for the benefit of another.
- 33) **'Trustee'** means a person holding property in trust. The person appointed or required by law to execute a trust; one in whom an estate, interest, or power is vested, under an express or implied agreement to administer or exercise it for the benefit or use of another.
- 34) **'Wire Fraud'** means scams that take place over interstate wires, such as telemarketing fraud, phishing, or spam-related schemes and includes any writings, signs, signals, pictures or sounds transmitted by wire, radio or television in interstate or foreign commerce. it takes place over phone lines or involves electronic communications.

## I. INTRODUCTION

- 1) Petitioners, Beneficiaries, Trustees, and Chiefs are Tribal family of the Guale Yamassee Indigenous Native American Association of Nations.<sup>16</sup>
- 2) Genealogically, Claimant Beneficiaries, Trustees and Chiefs are the direct hereditary descendants of the Tsalagi -Cherokee Tribe that existed in the Americas prior to the colonization, the forced migration, genocide, enslavement, disenfranchisement, forced assimilation and identity theft/stripping of the indigenous people.<sup>17</sup>
- 3) The Tsalagi-Cherokee family are the direct descendants of the evolutionary process of continuous human history from the direct blood line of Abraham, Isaac and Jacob, and the biblical Israelites who travelled to the Americas.<sup>18</sup>
- 4) The Tsalagi-Cherokee family are therefore from the direct bloodline of Shem; not Jepheth and not Ham.<sup>19</sup>
- 5) The Tsalagi-Cherokee family have been in the America's for over 10,000 years and are Ivriy or Hebrew.
- 6) When European nations arrived in the Americas, they were met by Ivriym (Hebrews), the Tsalagi, from the direct line of Abraham, Isaac and Jacob. All scholarly and

<sup>15</sup> See,

<https://www.ohchr.org/en/professionalinterest/pages/cat.aspx#:~:text=For%20the%20purposes%20of%20this,a%20t hird%20person%20has%20committed.> (site last visited 12.17.2020).

<sup>16</sup> See, Exhibit "YYY".

<sup>17</sup> See, Exhibit "SSS"

<sup>18</sup> See, 2<sup>nd</sup> Esdras, KJV of the Bible.

<sup>19</sup> See, HILDAH SHLOMIT DAVID, Hidden in Plain Sight, Second Exodus Edition, 202 (2019).

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competent men educated properly and appropriately and engaged in world affairs know this fact and Truth.

- 7) The Tsalagi-Chelokee family Nations assisted all colonial Europeans upon their arrival to America and engaged in bartering, trade, commerce, government and nation building assistance to the colonies.
- 8) Pennsylvania, Massachusetts, Virginia and the Carolinas are amongst several of the colonies that received assistance from the Tsalagi-Chelokee Nation.
- 9) Indigenous tribes were recognized in North America as Sovereign Nations during the 1600s when Colonial Europeans began to engage in commerce and trade and the Europeans entered into treaties with them to acquire land in exchange for protection and other benefits.<sup>20</sup>
- 10) Subsequent to the establishment and incorporation of the United States, the colonial government relied on treaties to conduct its formal relations with Indigenous tribes and continued the tradition the British Empire established and maintained with the Indigenous tribes, promising to protect and provide for the safety as well as other benefits to the tribes.<sup>21</sup>
- 11) Psalms 83:3 “[The nations] have taken crafty counsel against your people and consulted against your hidden ones. They have said ‘Come, and let us cut them off from *being* a nation; that the name of Yashar’el may be no more in remembrance.’ For [the nations] have consulted together with one consent: [the nations] are confederate against you.”<sup>22</sup>
- 12) In 1823, the U.S. Supreme Court noted “[Indian] tribes were regarded by the nations of Europe and by the United States as ‘distinct, Independent political communities, retaining their original natural rights’ and ranked ‘among those powers capable of making treaties’.”<sup>23</sup>
- 13) However, human rights violations as a result of nefarious intentions, sparked by barbatry, greed, revenge, bigotry, violence, and abuse of power emerged and served as the foundation and as *precedence* in American Legal Jurisprudence as a foundation for

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<sup>20</sup> STEPHEN L. PEVAR, *The Rights of Indians and Tribes*, 45 (2012).

<sup>21</sup> *Infra* and Articles of Incorporation Filed July 15, 1925 and See Treaties attached in x Credentials & Status VI, VII, VIII, and IX.

<sup>22</sup> See, CEPHER, PSALMS 83:3-6 (2018).

<sup>23</sup> *Infra* at 6 citing *Worcester v. Georgia*, 31 U.S. 515, 519 ((1832).



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**Manifest Destiny** and the excuse for the oppression and destruction of Indigenous Peoples and their Nations.<sup>24</sup>

14) Material breaches of treaties and promises made in return for assistance from Indigenous occurred, and unable to repay the debt, the united states surreptitiously devised a plan to overthrow, breach treaties and colonize the entire lands of America through use of divide and conquer strategies and getting the Indigenous to take sides in wars occurring between the Western European Nations with the goal of cutting them off from being a Nation.

a. "By persuasion and force, they have been made to retire from river to river and from mountain to mountain, until some of the tribes have become extinct and others have left but remnants to preserve for a while their once terrible names. Surrounded by the whites and their arts of civilization, which by destroying the resources of the savage doom him to weakness and decay."<sup>25</sup>

15) Under the Doctrine of Trust Responsibility, the Federal Government, acquiring land through negotiations and reaching **Agreements** called Treaties, created a special relationship and obligation between them and the Indigenous that imposes a legal duty on the federal government and its associate States.<sup>26</sup>

16) In 1949 The Geneva Convention was codified relating to the treatment of **prisoners of war** and **civilians during armed conflict** and in **occupied territory after war**.

17) The United States is a party to the Geneva Convention and occupies North America.<sup>27</sup>

18) Indigenous Peoples and the United States were at war for approximately 125 years subsequent the American Revolution.<sup>28</sup>

19) Indigenous Peoples are under subjugation in occupied lands on American soil, that have been usurped and colonized through acts of war, theft of land, and fraudulent contracts

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<sup>24</sup> WALTER R. ECHO-HAWK, In The Courts Of The Conqueror *The Ten Worst Indian Law Cases Ever Decided*, 399, 400 (2012).

<sup>25</sup> See, President Jackson's Message to Congress "On Indian Removal", December 6, 1830. Records of the United States Senate, 1789-1990; Record Group 46; Records of the United States Senate, 1789-1990; National Archives and Records Administration (NARA).

<sup>26</sup> See, <https://www.acf.hhs.gov/ana/resource/american-indians-and-alaska-natives-the-trust-responsibility#:~:text=The%20trust%20doctrine%20is%20a,tribes%20and%20respect%20their%20sovereignty>. (site last visited 12.16.2020).

<sup>27</sup> See, Laws and Customs of War on Land, Ratified by the President of the United States February 23, 1909.

<sup>28</sup> WALTER R. ECHO-HAWK, In The Courts Of The Conqueror *The Ten Worst Indian Law Cases Ever Decided*, 402 (2012) noting: "In the United States, only 250,000 American Indians were left alive in 1900 after 125 years of warfare, land dispossession, [forced] removal, and [forced] and enforced assimilation."

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- committed collectively by Germans, French, Spanish (including Portuguese), and British, who collectively established the United States of America.
- 20) The United Nations Charter laid the foundation for modern international human rights law. “the internationalization of human rights and the humanization of international law” began with the establishment of the United Nations.<sup>29</sup>
- 21) Legislative Acts and laws enacted, by the United States and their associates created and established a formalized code implementing and enforcing segregation and discriminatory laws with the discriminatory intent to discriminatorily impact and affect the Indigenous Peoples and cut them off from being a Nation, then and now.
- 22) The years between 1953 and 1968 are known as the ‘termination era’ concerning Indigenous Peoples in the United States. During this period, it was Congress’ intent to ‘detroy Indian tribes, force Indians to assimilate into Anglo-American society and reduce the governments assistance to Indians’.<sup>30</sup>
- 23) The very establishment of racial zoning laws was established to purposely enforce the discriminatory policies and effectuate and legalize discriminatory practices means to the very end.
- 24) The policies and acts enacted reliant upon segregating and maintaining a white supremacy superior living standard, was supported and encouraged with the United States government’ enforcement of such racially charged zoning ordinances, policies and laws.<sup>31</sup>
- 25) The colonial courts have a history plagued with prejudicial and unconstitutional decisions and a history issuing decrees and orders enforcing segregation, degradation and murder, violating the human rights and dignity of Indigenous Peoples.<sup>32</sup>
- 26) Legal Genocide of the Indigenous Peoples in North America was sanctioned every step of the way by courts, the legal system, the BAR associations, through men in black robes

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<sup>29</sup> See, JANIS, MARK W. and NOYES, JOHN E., *International Law, cases and controversies*, 356-358, 2<sup>nd</sup> Edition (2001).

<sup>30</sup> See, STEPHEN L. PEVAR, *The Rights Of Indians And Tribes*, 4<sup>th</sup> Edition 112 (2012)

<sup>31</sup> See, RICHARD ROTHSTEIN, *The Color of Law: A Forgotten History of How Our Government Segregated America: In Passim* (2017).

<sup>32</sup> See, WALTER R. ECHO-HAWK, *In the Courts of the Conqueror. The 10 Worst Indian Law Cases Ever Decided*, *In Passim* (2010) and WALTER R. ECHO-HAWK, *In the Light of Justice: The Rise of Human Rights in Native America and the U.N. Declaration on The Rights of Indigenous Peoples*, *In Passim* (2013).

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whose sole intents was clouded with prejudice and abuse of power,<sup>33</sup> and bearing false witness to advance and justify the fraud.<sup>34</sup>

27) False documents and doctrines were intentionally contrived by colonial occupiers of stature within positions of power, with the set goal and purpose of vilifying indigenous groups and reducing them in the eyes of *the law* to being less than human to justify their actions; a colonial legal plan designed as justification and a precondition for genocidal action to commence.<sup>35</sup>

a. “Now the chief priest and elders and all the council, sought false witness against Yahushua, to put him to death; but found none; yea, though many false witnesses came, yet found they none. At last came two false witnesses.”<sup>36</sup>

b. “And Yahudah Iyshqiryot, one of the twelve, went unto the chief priests, to betray him unto them. And when they heard, *it*, they were glad and promised to give him **money**.”<sup>37</sup>

28) From Negro, to Black to African American, the destruction of the Indigenous Nation, disenfranchisement of the Indigenous Family, Culture and Individual was legally constructed and orchestrated through the power of name status changing.

29) Trade between 1681 and 1790 consisted of bartering and the use of Wampums, which was used by Indigenous as well as the colonial settlers. As a means of destroying the Indigenous upper-hand in bartering and trade, the United States Government and its affiliate States, for the purpose of gaining the advantage in trade and establish the ability to finance its wars, the provincial government *paper currency* FIAT was introduced and

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<sup>33</sup> See, Johnson v. M’Intosh (1823) Indigenous Peoples identified as “fierce savages” and their “character and religion afford an apology for considering them as a people, over which the superior genius of Europe might claim an ascendancy”; 2) Cherokee Nation v. Georgia (1833) where the roots of American racism within the courts is unabashedly displayed referring to Indigenous Peoples as “a lowly ‘race of humans connected in society by scarcely a semblance of organic government’, restless warlike and signally cruel people with invertebrate habits and deep seated enmity”; 3) *Connors v. US & Cheyenne Indians* (1898) Unlawful use of force that nearly exterminated the North Cheyenne influenced Federal Indian Law; 4) *Lone Wolf v. Hitchcock* (1903) Judges relied upon the racial outlook of white supremacy to give birth to the plenary-power doctrine and provided Congress with absolute power over [Indigenous] property and affairs. Indigenous are described as “*weak, dependent people-simple wards of the government who can be ruled by fiat, as a fully colonized people*”;

<sup>34</sup> WALTER R. ECHO-HAWK, *In The Courts Of The Conqueror The Ten Worst Indian Law Cases Ever Decided*, In *Passim* (2012).

<sup>35</sup> See, WALTER R. ECHO-HAWK, *In the Courts Of The Conqueror The Ten Worst Indian Law Cases Ever Decided*, 407 (2012).

<sup>36</sup> See, CEPHER, MATTHEW Chpt. 26: 59, 60 (2018).

<sup>37</sup> See, CEPHER, MARK Chpt. 14:10, 11 (2018).



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- later Robert Morris encouraged chartering a bank to secure sufficient funding in emergencies.<sup>38</sup>
- 30) Upon ratification of the Constitution, the thirteen (13) former colonies, were fused into a single nation, one which, in its relations with foreign states, is bound to observe and construe the accepted norms of international law, formerly known as the law of nations.<sup>39</sup>
- 31) Under the Articles of Confederation, the several states had interpreted and applied this body of doctrine [international law], as a part of their common law...<sup>40</sup> and building their nations from colonies to States.
- 32) During the nineteenth and twentieth centuries, many colonies and former colonies, which became the United States, went through periods of warfare and forcible assimilation against native peoples. They engaged in:
- a. the appropriation of Native Land, and
  - b. the removal of indigenous populations from aboriginal areas, and
  - c. they implemented policies to stamp out indigenous cultures, prohibit languages, and suppress the practice of indigenous religions.<sup>41</sup>
- 33) On July 18, 2013 Letters Patent *ex cathedra* were drafted from the **Seat of Saint Peter** regarding the Doctrine of Discovery and atrocities committed against Indigenous Peoples.<sup>42</sup>
- 34) The document serves *prima facially* as an Admission of all controversial matters Indigenous Peoples have raised as grievances before all courts operating under the colonial American Jurisprudence System, while facially admitting that all Nations around the world were provided with the Authority extended from Rome through Papal Bull (Doctrine of Discovery) *Romanus Pontifex*.<sup>43</sup>
- 35) The controversial issues, which are not hypothetical or conjecture, concerned the mass Genocide and extermination and other numerous atrocities committed by the colonial occupiers then and now.

<sup>38</sup> See, DUNAWAY, History of Pennsylvania, Barter, Currency, and Banking 303-306 (1935).

<sup>39</sup> See, *FILARTIGA v. PENA-IRALA*, 630 F.2d 876 (2d Cir. 1980).

<sup>40</sup> *Id.* at *FILARTIGA v. PENA-IRALA*.

<sup>41</sup> See, WALTER R. ECHO-HAWK, In The Courts Of The Conqueror The Ten Worst Indian Law Cases Ever Decided, 15 (2010)

<sup>42</sup> See, *Letters Patent ex Cathedra*. Exhibit "ZZZ".

<sup>43</sup> See, Exhibit "EEE" Historical factual Reference vii.

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36) August 1, 2019, the current President of the United States commemorated the ending of 400 years of “African” slavery in the Americas.<sup>44</sup>

37) On August 21, 2019, an Errata Corrige was drafted and presented by The Administrative Office of Gule Yamassee Court and the Juris Consul Office and was Noticed to all agents of the United States judiciously, legally, and politically correcting the denationalizing labels and colonial categorical identities of all Indigenous Peoples.<sup>45</sup>

38) Here as in many cases throughout previous centuries, the Indigenous have provided:

- i. Notice of Status as Indigenous;
- ii. Notice of International Laws;
- iii. Notice of United States Laws;
- iv. Notice of Indigenous Government Orders and Constitution;
- v. Responses to Suits;
- vi. Filed Law Suits; and
- vii. Sought Remedy from International Courts.

39) Here, Indigenous Petitioners efforts have all either:

- a. Gone ignored, or have been
- b. Arbitrarily Dismissed and opined as being non-justiciable.

40) Consequently, in every case proffered within this matter, all nationals have been directly injured, not only to their person, but also in 1) executing government duties, 2) engaging in commerce through business, 3) conducting trade 4) contracts and 5) commerce through:

- i. Violation of Constitutional Inherent Fundamental and Implied Rights,
  - 1. Procedural due process
  - 2. Substantive due process
- ii. Violation of Treaty Rights;
- iii. Violation of Indigenous
- iv. Violation of Human Rights;
- v. Violation of Property (personal and real) Rights; and
- vi. Violation of International Law Rights.

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<sup>44</sup> See, H.R.1241 (115<sup>th</sup> Congress), “400 years of African-American History Commission Act”.

<sup>45</sup> See, Exhibit “AAAA” Historical factual Reference viii.

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**II. ORIGINAL JURISDICTION**

41) Jurisdiction is claimed under the following:

- a. **28 U.S.C. §1331** General Federal Question.
- b. **28 U.S.C. §1362** The district courts shall have original jurisdiction of all civil actions, brought by any [indigenous] tribe or band with a governing body duly recognized by the Secretary of the Interior, wherein the matter in controversy arises under the Constitution, laws, or treaties of the United States.
- c. **28 U.S.C. § 1350** Alien Tort Statute for violation of Treaty and violation of the international law, formerly known as the law of nations.
- d. **28 U.S.C. § 1353** The district courts shall have original jurisdiction of any civil action involving the right of any person, in whole or in part of Indian blood or descent, to any allotment of land under any Act of Congress or treaty.
- e. **Article III, section 2**, “Judicial Power shall extend to enumerated cases and controversies.”<sup>46</sup>
- f. **Marbury vs. Madison** and the scope of review for Article III Courts requires:
  - a. Standing,
  - b. Ripeness
  - c. Non-premature or moot matters

**28 U.S.C. § 1343 (42 U.S.C. Sec. 1983) indicating:**

“(a) The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person:

- (1) To recover damages for injury to his person or property, or because of the deprivation of any right or privilege of a citizen of the United States, by any act done in furtherance of any conspiracy mentioned in section 1985 of Title 42;
- (2) To recover damages from any person who fails to prevent or to aid in preventing any wrongs mentioned in section 1985 of Title 42 which he had knowledge were about to occur and power to prevent;

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<sup>46</sup> **Case or Controversy** applies for matters wherein constitutional issues will be resolved only in the context of concrete disputes, rather than in response to problems that may be hypothetical (lacking ripeness), abstract, or speculative. See, STONE, SEIDMAN, SUNSTEIN, TUSHNET, Constitutional Law, 2<sup>nd</sup> Edition, 84, 85 (1991).

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- (3) To redress the deprivation, under color of any State law, statute, ordinance, regulation, custom or usage, of any right, privilege or immunity secured by the Constitution of the United States or by any Act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States;
- (4) To recover damages or to secure equitable or other relief under any Act of Congress providing for the protection of civil rights, including the right to vote”.

**III. PARTIES**

- 42) Petitioner Xi Chin Clan Nation (hereinafter, the “Chin Clan”), is a Clan/Tribe that is affiliated and associated with the Guale Yamassee Indigenous Native American Association of Nations. Chief White Owl (hereinafter, “Chief Chin”) is the Chief of the Chin Clan. Chief Chin as the Chief for the Chin Clan brings this action on behalf of the Chin Clan and on behalf of himself. The Chin Clan’s business address for engaging in trade and commerce is: P.O. BOX 6666, Woodbridge, Virginia [22195] in Commonwealth of Virginia in North America.
- 43) Petitioner Harmon Rhashea Lynn Foreign Trust (hereinafter, the “Foreign Trust”), is a Private Indigenous Charitable Trust that operates to the benefit and function of Guale Yamassee Indigenous Native American Association of Nations and is the owner of: The Be Kind and Unified Foreign Private Family Indigenous Trust; The Indigenous Law Center, RLH Ma’at Law Office d/b/a RLH Ma’at Law Office & The Rights of Indigenous Peoples; and all real-estate property at issue in this matter known as: 1361 S. 46<sup>th</sup> Street, 6011 Chester Avenue, 50 Lovell Road, Holden Massachusetts. Rhashea Lynn Harmon’El, Esq. is the Trustee (hereinafter, “Trustee Harmon’EL”), and brings this action on behalf of the beneficiaries of the Estates and the Trusts, and on behalf of herself. The business address for engaging in trade and commerce is: P.O. BOX 7446, Philadelphia, Pennsylvania [19101] in the Commonwealth of Pennsylvania in North America.
- 44) Petitioner Rhashea Lynn Harmon’El, Esquire, is an indigenous living being, from the Tsalagi bloodline, d/b/a CHIEF JURIS CONSUL (CJC) and TRUSTEE, and a Clan member of Mund Bereefan with its principal place of business throughout all of North America, engaged in commerce at GUALE YAMASSEE COURT and HEALING INSTITUTE, 1361 S. 46<sup>th</sup> Street, PHILADELPHIA, PENNSYLVANIA [19143].
- 45) Petitioner Guale Yamassee Juris Consul Office, (hereinafter, the “JC Office”), is the legal arm of the Guale Yamassee Court. Rhashea Lynn Harmon’El, Esq. is the Juris Consul “Barrister” (hereinafter, “Consul Harmon’EL”), and brings this action on behalf of the beneficiaries of the Estates and the Trusts, and the Chin Clan and on behalf of herself. The business address for engaging in trade and commerce is: P.O. BOX 19835, Philadelphia, Pennsylvania [19143] and 1361 S. 46<sup>th</sup> Street,

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Philadelphia, Pennsylvania [19143] in the Commonwealth of Pennsylvania in North America.

- 46) Petitioner Guale Yamassee Compliance Department (hereinafter, the “GY Compliance”), is the Auditing and Compliance arm of the Guale Yamassee Court. Chief Chin is the Chief Auditor and Compliance Officer (hereinafter, “GY Auditor”), The business address for engaging in trade and commerce is: P.O. BOX 19835, Philadelphia, Pennsylvania [19143] and 1361 S. 46<sup>th</sup> Street, Philadelphia, Pennsylvania [19143], in America.
- 47) Respondent, Her Majesty the Queen d/b/a SOVEREIGN of ENGLAND is the Queen of England. Her principal place of business is Buckingham Palace, London SW1A, 1AA in the Kingdom of Britain.
- 48) Respondent, PENNSYLVANIA BAR ASSOCIATION is a non-profit corporation, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 100 SOUTH STREET, HARRISBURG, PENNSYLVANIA [17101].
- 49) Respondent, VIRGINIA BAR ASSOCIATION is corporation, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 1111 E. Main St., Suite 905, RICHMOND VIRGINIA [23219].
- 50) Respondent, NEW JERSEY STATE BAR ASSOCIATION is a non-profit corporation, with its principal place of business in the State of New Jersey, engaged in commerce at 1 CONSITUTION SQUARE, NEW BRUNSWICK, NEW JERSEY [08901].
- 51) Respondent, MASSACHUSETTS STATE BAR ASSOCIATION is a non-profit corporation, with its principal place of business in the Commonwealth of Massachusetts, engaged in commerce at 20 WEST STREET, BOSTON MASSACHUSETTS [02111-1204].
- 52) Respondent, THE SUPREME COURT OF PENNSYLVANIA, EASTERN DISTRICT, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 468 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 53) Respondent, LISETTE SHIRDAN-HARRIS, is a living being d/b/a JUDGE with Attorney Account Number: 61204 and is an AGENT FOR THE COURT OF COMMON PLEAS, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 692 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 54) Respondent, CAMILLE T. BARRY, is a living being d/b/a NOTARY and is the OWNER and AGENT of BEEREN & BARRY INVESTMENTS, LLC, with its

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principal place of business in the Commonwealth of Virginia, engaged in commerce at 11654 PLAZA AMERICA DRIVE, SUITE 653, RESTON, VIRGINIA [20190].

- 55) Respondent, BRANCH BANKING AND TRUST CORPORATION (BB&T), is a company with its principal place of business in the Commonwealth of North Carolina, engaged in commerce at 200 WEST SECOND STREET, WINSTON SALEM, NORTH CAROLINA [27101].
- 56) Respondent, RALPH NORTHAM, is a living being d/b/a GOVERNOR OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at OFFICE OF THE SECRETARY OF THE COMMONWEALTH SERVICE OF PROCESS DEPARTMENT, P.O. BOX 2452, RICHMOND, VIRGINIA [23218-2452].
- 57) Respondent, SECRETARY OF THE COMMONWEALTH OF VIRGINIA is a corporation, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at P.O. BOX 1795, RICHMOND, VIRGINIA [23218-1795].
- 58) Respondent, SAMUEL I. WHITE P.C. is a corporation, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 5040 CORPORATE WOODS DRIVE, SUITE 120, VIRGINIA BEACH [23462].
- 59) Respondent, JOSH SHAPIRO, an INDIVIDUAL d/b/a ATTORNEY GENERAL OF PENNSYLVANIA and AGENT of THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 393 WALNUT STREET, HARRISBURG, PENNSYLVANIA [17120].
- 60) Respondent, TOM WOLF, an INDIVIDUAL d/b/a ATTORNEY and GOVERNOR OF PENNSYLVANIA and AGENT of THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at MAIN CAPITAL, ROOM 225, HARRISBURG, PENNSYLVANIA [17120].
- 61) Respondent, THE COURT OF COMMON PLEAS, AOPC, is a corporation,, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 1515 MARKET STREET, SUITE 1414, PHILADELPHIA PENNSYLVANIA [19102].
- 62) Respondent, JIM F. KENNEY, is an individual d/b/a MAYOR OF THE CITY OF PHILADELPHIA and is an AGENT FOR COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 115 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].



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- 63) Respondent, DERRELL CLARK is an individual d/b/a CITY OF PHILADELPHIA COUNCIL PRESIDENT and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 494 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 64) Respondent, EUGENE BEDERMAN, is an individual d/b/a ATTORNEY and OWNER and AGENT E&E FINANCIAL, INC., with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 2337 Philmont Avenue, Suite 104A, and 2727 Philmont Avenue, Suite 122, HUNTINGDON VALLEY, PENNSYLVANIA [19006].
- 65) Respondent, MARK SQUILLA is an individual d/b/a CITY OF PHILADELPHIA MAJORITY WHIP COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 332 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 66) Respondent, KENYATTA JOHNSON is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 580 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 67) Respondent, JAMIE GAUTIER is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 586 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 68) Respondent, CURTIS JONES JR. is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER MAJORITY WHIP and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 404 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 69) Respondent, BOBBY HENON is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 484 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 70) Respondent, MARIA D. QUINONES SANCHEZ is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in

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the Commonwealth of Pennsylvania, engaged in commerce at 508 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].

- 71) Respondent, CINDY BASS is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 312 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 72) Respondent, CHERELLE PARKER is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 577/584 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 73) Respondent, BRIAN J. O'NEILL is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 562 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 74) Respondent, KENDRA BROOKS is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 4086 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 75) Respondent, ALLAN DOMB is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 316 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 76) Respondent, DEREK GREEN is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 594 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 77) Respondent, KATHERINE GILMORE is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in



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- the Commonwealth of Pennsylvania, engaged in commerce at 581 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 78) Respondent, HELEN GYM is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 592 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 79) Respondent, ALLAN DOMB is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 316 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 80) Respondent, DAVID OH is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 319 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 81) Respondent, ISAIAH THOMAS is an individual d/b/a CITY OF PHILADELPHIA COUNCIL MEMBER AT LARGE and is an AGENT FOR THE COMMONWEALTH OF PENNSYLVANIA, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 330 CITY HALL, PHILADELPHIA PENNSYLVANIA [19107].
- 82) Respondent, TRAVELERS INSURANCE AGENCY is a company incorporated in Massachusetts, with its principal place of business in the Commonwealth of Massachusetts, engaged in commerce at 545 SALEM STREET, 2<sup>ND</sup> FLOOR, WAKEFIELD, MASSACHUSETTS [01880].
- 83) Respondent, HARRY J. PARRISH II is an individual d/b/a MAYOR OF MANASSAS & CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 84) Respondent, PAMELA J. SABESKY is an individual d/b/a VICE MAYOR OF MANASSAS & CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 85) Respondent. MICHELLE DAVIS-YOUNGER is an individual d/b/a CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF

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VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].

- 86) Respondent, THERESA COATES-ELLIS is an individual d/b/a CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 87) Respondent, IAN LOVEJOY is an individual d/b/a CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 88) Respondent, MARK D. WOLFE is an individual d/b/a CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 89) Respondent, RALPH D. SMITH is an individual d/b/a CITY COUNCIL MEMBER and is an AGENT FOR THE COMMONWEALTH OF VIRGINIA, with its principal place of business in the Commonwealth of Virginia, engaged in commerce at 9027 CENTER STREET, MANASSAS, VIRGINIA [20110].
- 90) Respondent, MATRIX FINANCIAL SERVICES is a mortgage brokerage corporation, with its principal place of business in Arizona, engaged in commerce at 23910 N. 19<sup>TH</sup> AVENUE, SUITE 68 BUILDING 4, PHOENIX , ARIZONA [85085-0689].
- 91) Respondent, FLAGSTAR BANK (FSB) is a financial services corporation, with its principal place of business in MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 92) Respondent, JAMES K. CIROLL is an individual d/b/a Vice President and Chief Executive Officer of FLAGSTAR BANK, and is an AGENT and/or resident of THE STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 93) Respondent, LEE MATTHEW SMITH is an individual d/b/a Executive Vice President and Chief Operating Officer of FLAGSTAR BANK, and is an AGENT and/or resident of THE STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 94) Respondent, KRISTY WILLIAMS FARCHO is an individual d/b/a Vice President and PRESIDENT of FLAGSTAR BANK, and is an AGENT and/or resident of THE

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STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].

- 95) Respondent, DAVID L. URBAN is an individual d/b/a Vice President and DIRECTOR OF INVESTOR RELATIONS of FLAGSTAR BANK, and is an AGENT and/or resident of THE STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 96) Respondent, CHRIS BEATLEY is an individual and is an AGENT of BEEREN & BARRY INVESTMENTS, LLC in the Commonwealth of Virginia, engaged in commerce at 11654 PLAZA AMERICA DRIVE #653 [20190].
- 97) Respondent, PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES is a corporation, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 17 North 2<sup>nd</sup> STREET, SUITE 1300, HARRISBURG, PENNSYLVANIA [17101].
- 98) Respondent, CONSUMER FINANCIAL PROTECTION BUREAU is a corporation, of the United States, engaged in commerce at 1700 G. STREET, NW, WASHINGTON, D.C. [20552].
- 99) Respondent, VANESSA ELLISON is an individual d/b/a LOAN ADMINISTRATION ANALYST and AGENT of FLAGSTAR BANK, and is an AGENT and/or resident of THE STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 100) Respondent, ALESSANDRO P. DINELLO is an individual d/b/a PRESIDENT and CEO & DIRECTOR of FLAGSTAR BANK, and is an AGENT and/or resident of THE STATE OF MICHIGAN, engaged in commerce at 5151 CORPORATON DRIVE, TROY MICHIGAN [48098].
- 101) Respondent, PENNSYLVANIA HUMAN RELATIONS COMMISSION is a corporation, with its principal place of business in the Commonwealth of Massachusetts, engaged in commerce at Philadelphia Regional Office 10 N. 8<sup>TH</sup> STREET, SUITE 501, PHILADELPHIA, PENNSYLVANIA [19107].
- 102) Respondent, OFFICE OF THE SHERIF CITY and COUNTY OF PHILADELPHIA is a corporation, with its principal place of business in the Commonwealth of Massachusetts, engaged in commerce 100 S. BROAD STREET, 5<sup>TH</sup> FLOOR, PHILADELPHIA, PENNSYLVANIA [19110].
- 103) Respondent, COMMONWEALTH LAND TITLE INSURANCE COMPANY, is a corporation, with its principal place of business in the State of FLORIDA, engaged in commerce 601 RIVERSIDE AVENUER, JACKSONVILL, FLORIDA [32204].

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- 104) Respondent, FIDELITY NATIONAL FINANCIAL INC., is a corporation, with its principal place of business in the State of DELAWARE, engaged in commerce CORPORATION TRUST CENTER, 1209 ORANGE STREET, NEW CASTLE, DELAWARE [19801].
- 105) Respondent, CONTINENTAL MUTUAL INSURANCE COMPANY, is a corporation, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 8049 WEST CHESTER PIKE, UPPER DARBY PENNSYLVANIA [19083].
- 106) Respondent, ASI INSURANCE COMPANY, is a corporation, with its principal place of business in the State of Florida, engaged in commerce 2 ASI WAY, ST. PETERSBURG, FLORIDA [33702].
- 107) Respondent, THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA, d/b/a OFFICE OF JUDICIAL RECORDS FOR FILING is a corporation, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at Room 284, CITY HALL, PHILADELPHIA, PENNSYLVANIA [19107].
- 108) Respondent, PHELAN, HALLINAN DIAMOND & JONES, LLP is a corporation, with its principal place of business in the Commonwealth of Pennsylvania, engaged in commerce at 1617 JOHN F. KENNEDY BOULEVARD, SUITE 1400, ONE PENN CENTER PLAZA [19103].
- 109) Respondent, MICHAEL A. PELLEGRINO, is an Individual d/b/a ATTORNEY and an AGENT of PHELAN, HALLINAN DIAMOND & JONES, LLP, in the Commonwealth of Pennsylvania, engaged in commerce at 1617 JOHN F. KENNEDY BOULEVARD, SUITE 1400, ONE PENN CENTER PLAZA [19103].
- 110) Respondent, MICHAEL G. MCCABE, is an Individual d/b/a ATTORNEY and an AGENT of GRB LAW GROUP in the Commonwealth of Pennsylvania, engaged in commerce at 1425 SPRUCE STREET, SUITE 100, PHILADELPHIA, PENNSYLVANIA [19102].
- 111) Respondent, GERALD J. POMERANTZ, is an Individual d/b/a ATTORNEY and PRESIDENT and AGENT of GERALD J. POMERANTZ & ASSOCIATES, with its Principal Place of Business in the Commonwealth of Pennsylvania, engaged in commerce at 21 S. 12<sup>TH</sup> STREET, 7<sup>TH</sup> FLOOR, PHILADELPHIA, PENNSYLVANIA [19107].
- 112) DIVERSIFIED COMMUNITY SERVICES, INC., is a non-profit corporation with its Principal Place of Business in the Commonwealth of Pennsylvania, engaged in commerce at 1529 SOUTH 22<sup>ND</sup> STREET, PHILADELPHIA, PENNSYLVANIA 19146 [10286].

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- 113) Respondent, LINDA CARPENTER, is an Individual d/b/a ATTORNEY and JUDGE and AGENT for THE PHILADELPHIA COURT OF COMMON PLEAS, with its Principal Place of Business in the Commonwealth of Pennsylvania, engaged in commerce at 1418 CRIMINAL JUSTICE CENTER, PHILADELPHIA, PENNSYLVANIA [19107].
- 114) Respondent, FANTA SANOE, is an Individual engaged in trade and commerce in the United States of America, in the Commonwealth of Pennsylvania at 6829 GUYER AVENUE, PHILADELPHIA, PENNSYLVANIA [19142].
- 115) Respondent, IDEE C. FOX, is an Individual d/b/a ATTORNEY and JUDGE and AGENT for THE COURT OF COMMON PLEAS, with its Principal Place of Business in the Commonwealth of Pennsylvania, engaged in commerce at 656 CITY HALL, PHILADELPHIA, PENNSYLVANIA [19107].
- 116) Respondent, GUY LAREN, is an Individual d/b/a DEVELOPER and AGENT for NIS LAR LLC, with its Principal Place of Business in the Commonwealth of Pennsylvania, UNITED STATES OF AMERICA engaged in commerce at 4323 SPRUCE STREET PHILADELPHIA, PENNSYLVANIA [19104] and registered at 426 SOUTH 44<sup>TH</sup> STREET, PHILADELPHIA, PENNSYLVANIA [19104].
- 117) Respondent, JUSTIN L. KRIK, is an Individual d/b/a ATTORNEY and AGENT for KRIK LAW, with its Principal Place of Business in the Commonwealth of Pennsylvania, engaged in commerce at 1500 JOHN F. KENNEDY BOULEVARD, SUITE 630, PHILADELPHIA, PENNSYLVANIA [19102].
- 118) Respondent, YELENA SNIGUR, is an Individual d/b/a NOTARY and AGENT for FLAGSTAR BANK, engaged in commerce through licensing at: PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF COMMISSIONS, CAPITAL PARK, 401 NORTH STREET, HARRISBURG, PENNSYLVANIA [17101].
- 119) Respondent, BANK OF NEW YORK MELLON CORPORATION, is a Foreign Business Corporation, with its Principal Place of Business in the State of New York, engaged in commerce at 240 GREENWICH STREET, NEW YORK, NEW YORK [10286].
- 120) Respondent, THOMAS P. GIBBONS, is an individual d/b/a VICE CHAIR AND CHIEF FINANCIAL OFFICER and AGENT of BANK OF NEW YORK MELLON CORPORATION, is a Foreign Business Corporation, with its Principal Place of Business in the State of New York, engaged in commerce at 225 LIBERTY PLACE, NEW YORK, NEW YORK [10286].
- 121) Respondent, BANK OF AMERICA FINANCIAL CENTER, is a corporation, with its Principal Place of Business in the Commonwealth of North Carolina, engaged in commerce at 100 N. TRYON STREET, CHARLOTTE, NORTH CAROLINA [28255].



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- 122) Respondent, DITECH FINANCIAL LLC CENTER, is a Foreign Corporation, with its Principal Place of Business in the State of New York, engaged in commerce 3000 BAYPORT DRIVE, 1100 TAMPA, FLORIDA [33607].
- 123) Respondent, BAYVIEW LOAN SERVICING, LLC., is a Corporation, with its Principal Place of Business in the State of New York, engaged in commerce at 4425 PONCE DE LEON BOULEVARD, 5<sup>TH</sup> FLOOR, CORAL GABLES, FLORIDA [33146].
- 124) Respondent, WORCESTER COUNTY SHERIFF'S OFFICE and AGENTS is a Corporation, with its Principal Place of Business in the Commonwealth of Massachusetts, engaged in commerce at 240 MAIN STREET, WORCESTER, MASSACHUSETTS [01608].
- 125) Respondent, LEWIS G. EVANDELIDIS, is an individual d/b/a SHERIFF and an AGENT of WORCESTER COUNTY, with its Principal Place of Business in the Commonwealth of Massachusetts, engaged in commerce at 240 MAIN STREET, WORCESTER, MASSACHUSETTS [01608].
- 126) Respondent, WORCESTER COUNTY CITY COUNCIL is a Corporation, with its Principal Place of Business in the Commonwealth of Massachusetts, engaged in commerce at 445 MAIN STREET, WORCESTER, MASSACHUSETTS [01608].
- 127) Respondent, MORRIS A. BERGMAN, is an individual d/b/a COUNCILOR AT LARGE, and an AGENT of WORCESTER COUNTY, a corporation, with its Principal Place of Business in the Commonwealth of Massachusetts, engaged in commerce at 11 KENSINGTON HEIGHTS, WORCESTER, MASSACHUSETTS [01602].
- 128) Respondent, DONNA M. COLORIO, is an individual d/b/a COUNCILOR AT LARGE, and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 10 HOMER STREET, WORCESTER, MASSACHUSETTS [01602].
- 129) Respondent, KHRYSTIAN E. KING, is an individual d/b/a COUNCILOR AT LARGE, and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 9 VICTORIA AVENUE, WORCESTER, MASSACHUSETTS [01607].
- 130) Respondent, GARY ROSEN, is an individual d/b/a COUNCILOR AT LARGE, and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 11 HERBERT ROAD, WORCESTER, MASSACHUSETTS [01602].
- 131) Respondent, KATHLEEN M. TOOMEY, is an individual d/b/a COUNCILOR AT LARGE, in the Commonwealth of Massachusetts, engaged in commerce at 50 IDEAL ROAD, WORCESTER, MASSACHUSETTS [01604].

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- 132) Respondent, CANDY F. MERO-CARLSON, is an individual d/b/a DISTRICT 2 COUNCILOR and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 42 BENEDICT ROAD, WORCESTER, MASSACHUSETTS [01604].
- 133) Respondent, GEORGE J. RUSSELL, is an individual d/b/a DISTRICT 3 COUNCILOR and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 30 DOLLY DRIVE, WORCESTER, MASSACHUSETTS [01604].
- 134) Respondent, SARAI RIVERA, is an individual d/b/a DISTRICT 4 COUNCILOR and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 7 LUCIEN STREET, WORCESTER, MASSACHUSETTS [01603].
- 135) Respondent, JAMES P. LEONARD, is an individual d/b/a ATTORNEY and COMMISSIONER and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at DEPARTMENT OF RECORDS, 160 CITY HALL, PHILADELPHIA, PENNSYLVANIA [19107].
- 136) Respondent, MATTHEW E. WALLY, is an individual d/b/a DISTRICT 5 COUNCILOR and an AGENT of the Commonwealth of Massachusetts, engaged in commerce at 61 BERWICK STREET, WORCESTER, MASSACHUSETTS [01602].
- 137) Respondent, MCCARTER & ENGLISH LLP, is a Foreign Registered LLP corporation, with its principal place of business in the State of New York engaged in commerce at 265 FRANKLIN STREET, WORCESTER, MASSACHUSETTS [02110].
- 138) Respondent, WILLIAM FRANCIS GALVIN, is an individual d/b/a SECRETARY and AGENT of THE COMMONWEALTH, a corporation with its principal place of business in the Commonwealth of Massachusetts, engaged in commerce at MCCOMACK BUILDING, ONE ASHBURTON PLACE, ROOM 1611, BOSTON, MASSACHUSETTS [02108].
- 139) Respondent, BENJAMIN M. GREEN, is an individual d/b/a ATTORNEY and AGENT of the Commonwealth of Pennsylvania, engaged in commerce at 265 FRANKLIN STREET, BOSTON, MASSACHUSETTS [02110].
- 140) Respondent, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT C & L GROUP, is a corporation in the State of Oklahoma, engaged in commerce at 2488 E. 81<sup>ST</sup> STREET, SUITE 700, TULSA, OKLAHOMA [74137].

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- 141) Respondent, DANIEL WICKEY, is an individual d/b/a AGENT of HOMEBRIDGE FINANCIAL SERVICES, INC., in the State of New Jersey, engaged in commerce at 194 WOOD AVENUE SOUTH, 9<sup>TH</sup> FLOOR, ISELIN, NEW JERSEY [08830].
- 142) Respondent, ANTHONY N. RENZI, is an individual d/b/a AGENT of WALTER INVESTMENT MANAGEMENT CORPORATION, in the State of Florida, engaged in commerce at 3000 BAYPORT, SUITE 1100, TAMPA, FLORIDA [33607].
- 143) Respondent, GARY L. TILLET, is an individual d/b/a CHIEF FINANCIAL OFFICER and AGENT of WALTER INVESTMENT MANAGEMENT CORPORATION, in the State of Florida, engaged in commerce at 3000 BAYPORT DRIVE, SUITE 1100, TAMPA, FLORIDA [33607].
- 144) Respondent, MAURA HEALY, is an individual d/b/a ATTORNEY GENERAL of MASSACHUSETTS and AGENT of the OFFICE OF ATTORNEY GENERAL, corporation, in the Commonwealth of Massachusetts, engaged in commerce at 1 ASHBURTON PLACE, BOSTON, MASSACHUSETTS [02108].
- 145) Respondent, CHARLIE BAKER, is an individual d/b/a GOVERNOR OF MASSACHUSETTS and AGENT of THE COMMONWEALTH OF MASSACHUSETTS, a corporation, in the United States of America, engaged in commerce at MASSACHUSETTS STATE HOUSE, BEACON STREET #280, BOSTON, MASSACHUSETTS [12133].
- 146) Respondent, TIMOTHY FRENCH, is an individual d/b/a ATTORNEY and AGENT of THE COMMONWEALTH OF MASSACHUSETTS, a corporation in the United States of America, engaged in commerce at 900 CHELMSFORD STREET, SUITE 3102, LOWELL, MASSACHUSETTS [01851].
- 147) Respondent, JOHN C. CHAPMAN, is an individual d/b/a AGENT at THE OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION, a Corporation registered in THE COMMONWEALTH OF MASSACHUSETTS, a corporation associate of the United States of America, engaged in commerce at 501 BOYLSTON STREET, #5100, BOSTON, MASSACHUSETTS [02116].
- 148) Respondent, MICHAEL BOMSTEIN, is an individual d/b/a ATTORNEY, and OWNER and AGENT of PINNOLA & BOMSTEIN, a corporation of the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 100 SOUTH BROAD STREET, SUITE 2126, PHILADELPHIA, PENNSYLVANIA [19110].
- 149) Respondent, STRADLEY RONON STEVENS & YOUNG, LLP, is a corporation/ lobbying firm in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 2600 ONE



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COMMERCE SQUARE, 2005 MARKET STREET, SUITE 2600,  
PHILADELPHIA, PENNSYLVANIA [19103].

- 150) Respondent, ANDREW K. STUTZMAN, an individual d/b/a ATTORNEY and AGENT of STRADLEY RONON STEVENS & YOUNG, LLP, a corporation/lobbying firm in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 2600 ONE COMMERCE SQUARE, 2005 MARKET STREET, SUITE 2600, PHILADELPHIA, PENNSYLVANIA [19103].
- 151) Respondent, VLADIMIR V. PALMA, is an individual d/b/a ATTORNEY and AGENT of the STATE OF NEW JERSEY, a corporation, in the United States of America, engaged in commerce at 754 DARTMOOR AVENUE, WILLIAMSTOWN, NEW JERSEY [08094].
- 152) Respondent, DAVID ANDREW CRAMER an individual d/b/a ATTORNEY and AGENT of SUNDARSINGH LAW, a corporation in the STATE OF FLORIDA, a corporation associate of the United States of America, engaged in commerce at 4440 PGA BOULEVARD, SUITE 502, PALM BEACH, FLORIDA [43216].
- 153) Respondent, U.S. LIABILITY INSURANCE COMPANY (USLI), is a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1190 DEVON PARK DRIVE, WAYNE, PENNSYLVANIA [19087].
- 154) Respondent, BRANDON ROBERT GAMBLE is an individual d/b/a ATTORNEY and AGENT of U.S LIABILITY INSURANCE CO., a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1190 DEVON PARK DRIVE, WAYNE, PENNSYLVANIA [19087].
- 155) Respondent, ABIGAIL BRANIGAN BRUNNER, is an individual d/b/a ATTORNEY and AGENT of the COMMONWEALTH OF PENNSYLVANIA, a corporation in the United States of America, engaged in commerce at 402 BOUCKE BUILDING, UNIVERSITY PARK, PENNSYLVANIA [16802].
- 156) Respondent, AMY GUTMANN, an individual d/b/a UNIVERSITY OF PENNSYLVANIA PRESIDENT, for THE UNIVERSITY OF PENNSYLVANIA, a non-profit corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1 COLLEGE HALL, ROOM 100, PHILADELPHIA, PENNSYLVANIA [19104].
- 157) Respondent, PAUL KATZ, an individual d/b/a UNIVERSITY OF SCIENCES IN PHILADELPHIA PRESIDENT, a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged

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in commerce at 600 S. 43<sup>RD</sup> STREET, PHILADELPHIA, PENNSYLVANIA [19104].

- 158) Respondent, PREMIER TITLE COMPANY, is a corporation in the COMMONWEALTH OF VIRGINIA, a corporation associate of the United States of America, engaged in commerce at 8245 BOONE BOULEVARD, SUITE 410, TYSONS, VIRGINIA [22182].
- 159) Respondent, JENNIE SHNAYDER, is an individual d/b/a ATTORNEY and AGENT of LAW OFFICES OF DAMIAN G. WALDMAN, a corporation in the COMMONWEALTH OF PENNSYLVANIA, a Corporation associate of the United States of America, engaged in commerce at 148 EAST STREET ROAD, SUITE 352, FEASTERVILLE, PENNSYLVANIA [19053].
- 160) Respondent, DAMIAN G. WALDMAN, is an individual d/b/a ATTORNEY and OWNER and AGENT of LAW OFFICES OF DAMIAN G. WALDMAN, a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 148 EAST STREET ROAD, SUITE 352, FEASTERVILLE, PENNSYLVANIA [19053].
- 161) Respondent, PETER WILLIAM WAPNER, is an individual d/b/a ATTORNEY and AGENT of PHELAN HALLINAN DIAMOND & JONES, LLP, a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1617 JOHN F. KENNEDY BOULEVARD, PHILADELPHIA, PENNSYLVANIA [19103].
- 162) Respondent, THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA, PHILADELPHIA COURTS LANDLORD TENANT COURT, is a corporation in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1339 CHESTNUT STREET, ROOM 1020, PHILADELPHIA, PENNSYLVANIA [19107].
- 163) Respondent, INTERNAL REVENUE SERVICE, is a corporation affiliate of the United States of America, engaged in commerce at 3320 NOBLE POND WAY, WOODBRIDGE, VIRGINIA [22193].
- 164) Respondent, FEDERAL DEPOSIT INSURANCE CORPORATION, is a corporation in the DISTRICT OF COLUMBIA, a corporation associate of the United States of America, engaged in commerce at 550 17<sup>th</sup> STREET, N.W. WASHINGTON, DISTRICT OF COLUMBIA, [20429].
- 165) Respondent, NEW YORK STATE BAR ASSOCIATION, is a non-profit corporation, with its principal place of business in the STATE OF NEW YORK, a corporation associate of the United States of America, engaged in commerce at 1 ELK STREET, ALBANY, NEW YORK [12207].

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- 166) Respondent, CITY OF PHILADELPHIA, OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT, is a corporation, with its principal place of business in the COMMONWEALTH OF PENNSYLVANIA, a corporation associate of the United States of America, engaged in commerce at 1234 MARKET STREET 17<sup>TH</sup> FLOOR, PHILADELPHIA, PENNSYLVANIA [19107].

#### IV. APPLICABLE RULES AND LAWS

- 167) This case arises under the following applicable laws for which remedy is afforded:
- a. **Torah**<sup>47</sup> (Natural Law encompassing the morals, ethics and culture of the Ivriy from their Elohiym, Yahuah):
    - i. “3 You shall have no other Elohiym before me.
    - ii. 4 You shall not make unto you any graven image, or any likeness of anything that *is* in the heavens above, or that *is* in the earth beneath, or that *is* in the water under the earth: 5 You shall not bow down yourself to them, nor serve them: for I Yahuah Elohayka *am* a jealous El, visiting the iniquity of the fathers upon the children unto the third and fourth *generation* of them that hate me; 6 And showing mercy unto thousands of them that love me, and guard my commandments.
    - iii. 7 You shall not take  $\aleph$  eth-the name of Yahuah Elohayka in vain; for Yahuah will not hold him guiltless  $\aleph$  eth that takes  $\aleph$  eth-his name in vain.
    - iv. 8 Remember  $\aleph$  eth-the day of the Shabbath, to keep it holy. 9 Six days shall you labour, and do all your work: 10 But the seventh day *is* the Shabbath of Yahuah Elohayka: *in it* you shall not do any work, you, nor your son, nor your daughter, your manservant, nor your maidservant, nor your cattle, nor your stranger that *is* within your gates: 11 For *in* six days Yahuah made  $\aleph$  eth-the heavens and  $\aleph$  eth-the earth,  $\aleph$  eth-the sea, and  $\aleph$  eth-all that in them *is*, and rested the seventh day: wherefore Yahuah blessed  $\aleph$  eth-the day of Shabbath, and hallowed it.
    - v. 12 Honour  $\aleph$  eth-your father and  $\aleph$  eth-your mother: that your days may be long upon the land which Yahuah Elohayka gives you.
    - vi. 13 You shall not kill.
    - vii. 14 You shall not break wedlock.
    - viii. 15 You shall not steal.
    - ix. 16 You shall not bear false witness against your neighbour.
    - x. 17 You shall not lust after your neighbour's house, you shall not lust after your neighbour's woman, nor his manservant, nor his maidservant, nor his ox, nor his ass, nor anything that *is* your neighbour's.”<sup>48</sup>
  - b. **U.N. Charter:** (Treaty of the United States, 59 Stat. 1033, 1035 and 1037 (1945)) “in this modern age a state's treatment of its own citizens is a matter of international concern. The United Nations shall promote...universal respect for

<sup>47</sup> See, *Bere 'Shiyth* (Genesis), *Shemoth* (Exodus), *Vayiqra* (Leviticus), *Bemidbar* (Numbers), *Devaryim* (Deuteronomy).

<sup>48</sup> See,  $\aleph$  CEPHER *Shemot*, (Exodus) *Chapter* 20:3-17.

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- the observance of human rights and fundamental freedoms for all without distinction as to race, sex, language or religion.”;
- c. **Universal Declaration on Human Rights:** (General Assembly Resolution 217(III)(A) (Dec.10 1948));
  - d. **The American Declaration on the Rights and Duties of Man;**
  - e. **U.N. Declaration on the Rights Against Torture;**
  - f. **Customary International Law of Human Rights;**
  - g. **The Law of Nations aka International law;** “International Law is a part of our law and must be ascertained and administered by the courts of justice of appropriate jurisdiction, as often as questions of right, depending upon it are duly presented for their determination. For this purpose, where there is no treaty and no controlling executive or legislative act or judicial decision, resort must be had to the customs and usages of civilized nations.”<sup>49</sup>;
  - h. **The Federal Constitution** (International Law is incorporated by the Constitution of the Federal Government).<sup>50</sup>;
  - i. **Department of State, Country Reports on Human Rights for 1979**, published as Joint Comm. Print, House Comm. On Foreign Affairs, and Senate Comm. On Foreign Relations, 96<sup>th</sup> Cong 2d Sess. (Feb. 4, 1980) “We have been directed to no assertion by any contemporary state of a right to torture its own or another nation’s citizens.”;
  - j. **The Declaration on the Rights of Indigenous Peoples;** “A declaration creates an expectation of adherence and ‘insofar as the expectation is gradually justified by State practice, a declaration may by custom become recognized as laying down rules binding upon the States’.”;
  - k. **The American Declaration on the Rights of Indigenous Peoples (June 22, 2017)**
  - l. **FILARTIGA v. PENA-IRALA**, 630 F. 2d ((2<sup>nd</sup> Cir. 1980);
  - m. **Vienna Convention:** (Codifies the Law of Treaties);
  - n. **Jus Cogens** (Natural Law);
  - o. **Doctrine of Sacred Trust** (activated through Guale Yamassee Mund Bereefan Constitution);
  - p. **The Constitution of An Indigenous Peoples, Mund Barefan Clan Indigenous Native American Association of Nations;**
  - q. **The Constitution of An Indigenous Peoples, Mt’ A’rafat Embassy Clan Yamassee Native Americans (An Organic Constitution) and Mund Bareefan Clan Indigenous Native American Association of Nations Bill of Rights;**
  - r. **Hague Convention** (Ratified by the United States February 28, 1909);
  - s. **Genocide Convention;**
  - t. **The Law of Equity**

V. JUDICIAL NOTICE

- 168) As a general rule of international law, “immoral treaties are forbidden and therefore no valid obligation can come into existence concerning the immoral contents of the

<sup>49</sup> See, *The Paquette Habana*, 175 U.S. 677, 20 S.Ct. 290, 44 L.Ed. 320 (1900).

<sup>50</sup> See, *Foster & Elam v. Neilson*, 27 U.S. 253, 7 L.Ed. 415 (1829).

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treaty. Therefore, every tribunal or permanent court, to which a conflict is submitted, in which a treaty is involved, is under a duty to take judicial notice that such treaties void, even if there be no demand by a party to this effect.”<sup>51</sup>

169) A formal voidance of immoral contents of treaties is not necessary; they are *void ab initio*.<sup>52</sup>

170) **Rule 3.3. Candor towards the Tribunal:**

“Attorneys must cite directly adverse legal authority controlling in the court’s jurisdiction. The duty applies even when the attorney on the other side fails to cite such authority. Labeled under the title “Candor Toward the Tribunal,” Model Rule 3.3(a)(2) notes that ‘a lawyer shall not knowingly ... fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel’.”<sup>53</sup>

or

(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer’s client, or a witness called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

(b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.

(c) The duties stated in paragraphs (a) and (b) continue to the conclusion of the proceeding, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.

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<sup>51</sup> See, 31 *American Journal of International Law* 571 (1937).

<sup>52</sup> *Id.*

<sup>53</sup> See, <https://www.abajournal.com/magazine/article/duty-to-disclose-adverse-legal-authority#:~:text=Labeled%20under%20the%20title%20%E2%80%9CCandor,not%20disclosed%20by%20opposing%20counsel.%E2%80%9D>. (site last visited 12.10.2020).

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(d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.<sup>54</sup>

- 171) Dual Citizenship of Indigenous peoples is a human right and legal right afforded through the Constitution and International Human Rights Law and general international law under Jus Cogens as well as through United States Congress.
- a. On June 2, 1924, Congress passed a law granting citizenship to all [Indigenous] born in the United States.<sup>55</sup>
  - b. An [Indigenous] can be both a citizen of the United States and a member of an [Indigenous] tribe and have all the benefits and obligations that arise out of that dual status.
- 172) Congress passed the Indian Reorganization Act as the result of the 1928 Miriam Report assessment on the problems of Native Americans, which “revealed to the government that its policies had **oppressed** Native Americans and **destroyed** their culture and society”.<sup>56</sup>
- 173) Article VI, paragraph (2) of the Constitution, known as the Supremacy Clause, states:
- “This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding.”<sup>57</sup>
- 174) “The federal criminal statute that enforces Constitutional limits on conduct by law enforcement officers is 18 U.S.C. § 242. Section 242 provides in relevant part:
- ‘Whoever, under color of any law, ...willfully subjects any person...to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States [shall be guilty of a crime].’

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<sup>54</sup> See, *Model Rule 3.3 Rules of Professional Conduct*.

<sup>55</sup> Indian Citizenship Act of 1924 and

[https://www.americaslibrary.gov/jb/jazz/jb\\_jazz\\_citizens\\_1.html#:~:text=But%20on%20June%202%2C%201924,barr ed%20Native%20Americans%20from%20voting](https://www.americaslibrary.gov/jb/jazz/jb_jazz_citizens_1.html#:~:text=But%20on%20June%202%2C%201924,barr ed%20Native%20Americans%20from%20voting). (cite last visited 12.16.2020).

<sup>56</sup> [https://www.americaslibrary.gov/jb/jazz/jb\\_jazz\\_citizens\\_3.html](https://www.americaslibrary.gov/jb/jazz/jb_jazz_citizens_3.html). (cite last visited 12.16.2020).

<sup>57</sup> See, United States Constitution of America, Article VI, Paragraph (2).



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Section 242 is intended to "protect all persons in the United States in their civil rights and furnish the means of their vindication." *Screws v. United States*, 325 U.S. 91, 98 (1945) (quoting legislative history).<sup>58</sup>

## VI. EXCEPTIONS TO GOVERNMENTAL IMMUNITY

175) When the government acts as a "Market Regulator" it is widely known and understood within the judicial and legal community that governmental immunity is non-applicable and therefore an exception to the Commerce Clauses' as a Market Participant exception to the scrutiny rule regarding a state discriminating against another state or favoring its own "citizens" while discriminating against others. The impact of this exception is felt in cases where the state itself produced goods for commerce or where it has engaged in a program of subsidies or other economic incentives to aid in-state businesses.<sup>59</sup>

176) Under title 42 U.S.C. §2000-7-Civil Rights Remedies Equalization, "(1) A State shall not be immune under the Eleventh Amendment of the Constitution of the United States from suit in Federal court for a violation of section 504 of the Rehabilitation Act of 1973 [29 U.S.C. 794], title IX of the Education Amendments of 1972 [20 U.S.C. 1681 et seq.], the Age Discrimination Act of 1975 [42 U.S.C. 6101 et seq.], title VI of the Civil Rights Act of 1964 [42 U.S.C. 2000d et seq.], or the provisions of any other Federal statute prohibiting discrimination by recipients of Federal financial assistance."<sup>60</sup>

## VII. COLORABLE LAWS CHALLENGED AS UNCONSTITUTIONAL UTILIZED BY GOVERNMENT FACTIONS, ASSOCIATES AND/OR OPERATIVES

- 177) 1066 Norman Conquest & The Establishment of Feudal Laws;
- 178) The Doctrine of Discovery<sup>61</sup> an international Papal Bull that is the source of United States title to property;<sup>62</sup>
- 179) The Doctrine of Terra Nullius;
- 180) 1724 Noir Codes;
- 181) Housing and Urban Development (HUD) surreptitious Discriminatory Requirements (no blacks, no minorities, for 'whites' only) practices and policies;
- 182) Housing Market Discrimination (Homestead laws) surreptitious Discriminatory Requirements (no blacks, no minorities, for 'whites' only) practices and policies;

<sup>58</sup> See, <https://www.justice.gov/crt/law-enforcement-misconduct>, (site last visited 12.10.2020).

<sup>59</sup> See, [https://www.law.cornell.edu/wex/market\\_participant\\_exception](https://www.law.cornell.edu/wex/market_participant_exception) and

<sup>60</sup> Also see, Pub.L. 99-506, title X, §1003, October 21, 1986, 100 Stat. 1845).

<sup>61</sup> See, Exhibit "S" and *Jus Post Limini*

<sup>62</sup> See, [https://www.americanbar.org/groups/crsj/publications/human\\_rights\\_magazine\\_home/2014\\_vol\\_40/vol--40--no--1--tribal-sovereignty/short\\_history\\_of\\_indian\\_law/?q=&fq=\(id%3A%5C%2Fcontent%2Faba-cms-dotorg%2Fen%2Fgroups%2Fcrsj%2F\\*\)&wt=json&start=0](https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/2014_vol_40/vol--40--no--1--tribal-sovereignty/short_history_of_indian_law/?q=&fq=(id%3A%5C%2Fcontent%2Faba-cms-dotorg%2Fen%2Fgroups%2Fcrsj%2F*)&wt=json&start=0), (site last visited, 12.10.2020).

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- 183) FHA's Underwriting Manual that discriminates specifically against Indigenous Peoples;
- 184) Predatory Lending (target low income, minorities and seniors with high chance of defaulting to dispossess collateral and keep any monies acquired through payment and take property through land grabbing);
- 185) Hegemony (united states rule of might and oppression over indigenous);
- 186) Doctrine of Constant Preemptive Warring;
- 187) Unconstitutional Legislative Acts;
- 188) Unconstitutional judicial precedential opinions; and
- 189) Unconstitutional policies supporting the deprivation of rights of Indigenous peoples.

**VIII. FINDINGS OF FACTS**

- 190) On May 21, 2012 correspondence was forwarded to QUEEN ELIZABETH, SOVEREIGN of ENGLAND regarding the unconstitutional and inhumane treatment by United States government and the associate States.<sup>63</sup>
- 191) On December 11, 2013 a Summons for Unlawful Detainer was filed after alleged foreclosure proceedings and a sale were initiated against res 5981 Callie Furnace Court, Manassas Virginia 20112.
- 192) On January 3, 2014 a Default Judgment was entered and Notarized by the purchaser of the res 5981 Callie Furnace Court, Manassas Virginia 20112.<sup>64</sup>
- 193) Several attempts to contact and address the court and the authorities regarding the fraudulent attempt to foreclose on Res 5981 Callie Furnace Court, Manassas VA 20112 were made to no avail.
- 194) On February 14, 2014 the Prince William General District Court "John Doe" Judge informed Indigenous Petitioner clan mother: "you are an attorney now" and he put the Xi Chin Clan Chief on the stand to be questioned by his wife.
- 195) The Judge was informed that "this process is unconstitutional" and that "there are "treaties governing the agreements the Tribe has with the united states and its colonial citizens, which are trade secrets through Trade and Commerce".
- 196) The Prince William General District Court "John Doe" Judge, who was called out of retirement informed Chief Chin "I don't want to hear that" and dismissed the case in favor of movant Petitioners to Foreclose immediately.

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<sup>63</sup> See, Exhibit "E".

<sup>64</sup> See, Exhibit "L".



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- 197) On February 03, 2014 Respondents filed a Motion to Dismiss on case: GV13017599-00.<sup>65</sup>
- 198) On February 07, 2014, a motion to dismiss the fraudulent foreclosure matter was denied against Respondents and Respondents were informed by correspondence from Prince William General District Court.<sup>66</sup>
- 199) On February 10, 2014, Respondents received correspondence, executed by Deputy Clerk Rhonda Daley, notifying Respondents that their Motion had been denied and that “court policy is that when without counsel, plaintiff’s or defendant’s file a Motion, the Motion has to be sent to a Judge for Appeal”.<sup>67</sup>
- 200) On February 14, 2014 Commonwealth through its Courts without providing Petitioner’s with the opportunity to lawfully and constitutionally respond, lawfully defend, or lawfully challenge the foreclosure, ruled in favor of the Claimants bringing the Fraudulent Foreclosure suit against them.
- 201) The Court immediately issued a writ of possession to take and seize the property.
- 202) On February 18, 2014 the Xi Chin Clan, received an EVICTION NOTICE from the Prince William County Sheriff’s Office, informing the Indigenous Chief and his wife that they “MUST VACATE BY 8AM”.<sup>68</sup>
- 203) At all times the res 5981 Callie Furnace Court, Manassas VA 20112 was and remains lawfully the property of Indigenous organizations and Indigenous Peoples.
- 204) At all times the Commonwealth of Virginia, Prince William County, its agents, employees, contractors and attorneys and trustees engaged in unscrupulous and fraudulent acts that defy any semblance of Justice and Equality in direct violation of the Constitution and Treaty law.
- 205) At all times the Commonwealth of Virginia, Prince William County, its agents, employees, contractors and attorneys and trustees failed to honor Treaty, the Constitution, International Law and Federal Law regarding dealings or treating with Indigenous Peoples.
- 206) At all times, the acts of the Commonwealth of Virginia, Prince William County, its agents, employees, contractors and attorneys and trustees violated Respondents Human Rights and Fundamental Constitutional Rights to be a human.

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<sup>65</sup> See, Exhibit “P”.

<sup>66</sup> See, Exhibit “P”.

<sup>67</sup> See, Exhibit “P”.

<sup>68</sup> See, Exhibit “Q”.

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- 207) At all times the Commonwealth of Virginia, Prince William County, its agents, employees, contractors and attorneys and trustees deliberately engaged in acts that violate the Hague Convention regarding War on Land and Occupation.
- 208) At all times the Commonwealth of Virginia, Prince William County, its agents, employees, contractors and attorneys and trustees engaged in acts that were unlawful, unconscionable and terroristic, but asserted their acts as being lawful for the sole benefit of profiting and land grabbing due to the economic collapse that began in 2008 of the United States of America.
- 209) In 2014 the City of Philadelphia, through its agents, employees and contractors began engaging in harassing and intentional acts to defraud beneficiary Michael A. Harmon'El of his rights to property in trust by the HARMON RHASHEA LYNN FOREIGN TRUST.
- 210) The City of Philadelphia, along with the Philadelphia Water Department and the Philadelphia Court of Common Pleas conspired to defraud and extort funds from beneficiary, Michael A. Harrmon'El.<sup>69</sup>
- 211) From 2014 to 2017 Res 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839,-75.1652215 remained without running water, however, the City of Philadelphia, in an effort to keep in line with operation "warp speed" to remove all Indigenous to make space for Gentrification fraudulently contrived a bill and liened the property and foreclosed.<sup>70</sup>
- 212) Mr. Harmon'El, attempted to resolve the matter with the City of Philadelphia through inquiries into how he was accumulating a bill at Res 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839,-75.1652215 when there was no water running water at that property location.
- 213) As with Chief White Owl's matter in the Commonwealth of Virginia, all attempts to resolve the matter and correct the error were ignored and beneficiary Mr. Harmon'El was told to "just make a payment".
- 214) The City of Philadelphia had no interest in investigating the matter. Their objective was clearly to obtain payment by any means necessary to meet the foreclosure quota the City relied upon for profit.

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<sup>69</sup> See, Complaint CaseID: 160203972 Exhibit "X".

<sup>70</sup> See, Exhibit "TTT".

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- 215) The City of Philadelphia in no agency capacity ever contacted the Trustee of the said Res located at: 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839, -75.1652215.
- 216) The Res 6011 Chester Avenue, Philadelphia, Pennsylvania 39.9525839, -75.1652215 at the time of the unconstitutional taking and foreclosure was valued at \$70,000. <sup>71</sup>
- 217) The 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839, -75.1652215 was unconstitutionally foreclosed upon and taken with the approval, permission and assistance of the Philadelphia Government and an unlawful Deed Transfer was effectuated by the City of Philadelphia Courts and the Recorder of Deeds Office.
- 218) All recordings occur at the Recordings Office which is operated by an attorney, who is a part of the common scheme and plan of property dispossession of all Indigenous to advance the new zoning plans and development plans which do not include the Indigenous.
- 219) The City of Philadelphia unconstitutionally and fraudulently transferred title of Indigenous property Res: 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839, -75.1652215 in 2016.
- 220) The City of Philadelphia Court of Common Pleas, through the acts of its agents, unconstitutionally demanded payment through extortionary means, of beneficiary Mr. Harmon'El to hear and consider the Fraudulent Foreclosure matter in the colonial court, located at City Hall, Philadelphia, Pennsylvania.
- 221) On September 08, 2016 Mr. Harmon'El filed Petition to Proceed in Forma Pauperis. The Petition was approved<sup>72</sup> because Mr. Harmon'El due to his disability was receiving assistance and had no independent income.
- 222) On February 22, 2017, an officer and agent of the united states Pennsylvania Court, Judge Carpenter issued an arbitrary and prejudicial and discriminatory ORDER denying Mr. Harmon'El, access to Court because he "failed to pay \$7370.00 into the Office of Judicial Records" and further ORDERED the unconstitutional EJECTMENT of Mr. Harmon'El from 6011 Chester Avenue, Philadelphia Pennsylvania 39.9525839, -75.1652215.
- 223) The City of Philadelphia, through its agent operatives, have continuously engaged in the common scheme and plan of dispossessing Indigenous peoples of their rightfully owned property, denying them at all times of all procedural and substantive due process rights and intentionally violating human rights laws internationally and nationally.

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<sup>71</sup> See, Exhibit "V". The property was sold at Auction for less than \$7000.

<sup>72</sup> See, attached Exhibit "BB".

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- 224) The City of Philadelphia's government council and agents have been aware of the unconstitutional and fraudulent foreclosures for decades, and have refused to cease the growing exponentially growing homeless problem as a result of their sanctioned takings.
- 225) The Philadelphia and Virginia fraudulent foreclosure matters parallel each other utilizing the same unlawful tactics and barriers to *justice*.
- 226) The Philadelphia and Virginia fraudulent foreclosure matters parallel each other as if a nationwide conspiratory eviction of all Indigenous are in effect.
- 227) At no time were the acts of the Commonwealth through their operatives and agents lawful and their acts are known and sanctioned through laws enacted by the legislature and city council of the Commonwealths.
- 228) At no time during the proceedings did the City of Philadelphia or its agents and contractors including the Sheriff's Office, provide the Trustee with proper and legal NOTICE regarding the unlawful takings and dispossession of real and personal property.
- 229) In all matters the Trustees and Chiefs of the clans and parties responsible for the property were ignored, ridiculed and treated as peons and crud.
- 230) Trustees and beneficiaries as a result of the unconstitutional trespassory taking and dispossession of real and personal property have suffered irreparable harm and substantial financial and wealth set-backs for the clan and tribe and Nation.
- 231) Trustees and beneficiaries as a result of the unconstitutional trespassory taking and dispossession of real and personal property have suffered irreparable loss of tribal historical documents and artifacts and possessions that had been generationally in the Clan for more than 200 years.
- 232) On 10.24.2016 correspondence was forwarded by Any Means Intended Necessary Trustee, Vera Jones to Mr. "Raven-Melchiz:El:: along with copy of 03.03.2016 correspondence from RLH Ma'at Law & The Rights of Indigenous Peoples, and a copy of the Certificate of Guardian or Trustee and correspondence requesting a Forensic Audit.
- 233) On 12.19.2016, correspondence directed solely to Vera L. Jones C/O Vera Jones 1818 S. Alden St, Philadelphia PA 19143 was forwarded for the first time, directly to Ms. Jones as a "Flagstar Customer" notifying her specifically, "your failure to make timely payments on the mortgage note has caused a default on your mortgage" and that "this letter is part of Flagstar Bank's debt collection process. Prior to any

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communication by Ms. Vera Jones or RLH Ma'at Law & The Rights of Indigenous Peoples, Flagstar Bank had never seen or made contact with Ms. Vera L. Jones.

- 234) On **12.23.2016**, on letter head titled May E. McCloud C/O Vera Jones, 1818 South Alden Street, Philadelphia, Pennsylvania, 19143-5504, Vera Jones, as Plenary Guardian forwarded correspondence notifying Flagstar Bank:
- i. Receipt of homeowner package and am reviewing;
  - ii. Requesting a detailed explanation on what the current mortgage loan balance is, and
  - iii. Copy of both the current mortgage lien and the mortgage note/contract.
- 235) The correspondence was executed by Ms. Jones and notarized December 23 2016.
- 236) Further, on **12.23.2016**, an Affidavit For Truth and Fact was executed by Vera L. Jones and notarized and forwarded to RLH Ma'at Law & The Rights of Indigenous Peoples.
- 237) On **12.27.2016**, Flagstar Bank forward correspondence to May E. McCloud C/O VERA JONES, 1818 S. ALDEN ST, PHILADELPHIA, PA 19143-5504:
- i. Acknowledging receipt of Vera L. Jones' correspondence regarding the authorization of a third party; and
  - ii. Enclosing Standard Third Party Authorization Form; and
  - iii. Instructed to "resubmit as your original correspondence will be shredded".
- 238) Thereafter, Flagstar Bank proceeded to call Ms. Jones and Ms. McCloud at all times of the day, night and weekends, refusing to communicate with the assigned third party Indigenous Financial Auditor and Indigenous Human rights Lawyer.
- 239) On **01.09.2017**, correspondence was forwarded to Flagstar Bank regarding an alleged "Mortgage Loan #0503182676, headed Notice to principal is Notice to Agent, Notice to Agent is Notice to Principal, notifying Flagstar Bank that RLH Ma'at Law and The Rights of Indigenous Peoples had been retained to assist in the matter and that contact in March Of 2016 had been made to them informing them to cease all direct withdraws from May E. McCloud's bank account and notification of Flagstar Bank's continued feigned ignorance towards RLH Ma'at Law and The Rights of Indigenous Peoples' representation of the matter.
- 240) On **01.11.2017**, Vera L Jones executed a Flagstar document titled "THIRD PARTY AUTHORIZATION FORM" authorizing Rhashea Lynn Harmon'El, Esq., to serve as:
- i. Individual,
  - ii. Company

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- iii. Attorney
- iv. Trustee

On behalf of Account Loan Number: 0503182676. It was Notarized **01.11.2017**.

- 241) On **01.13, 2017**, correspondence was addressed to MAY E MCCLOUD C/O VERA JONES 1515 S. ALDEN STREET, PHILADELPHIA, PA 19143 and directed "To whom it may concern". The correspondence acknowledged receipt of "your request for account information for the borrower(s) stated above".
- a. The borrower (s) stated above on correspondence 01.13.2017 was listed solely as: "May E. McCloud Property Address: 1361 S. 46<sup>th</sup> Street Philadelphia, PA 19143 and Listed as Loan Type: First Mortgage Only Conventional".
  - b. The "Servicing Research Department" of "Flagstar Bank, enclosed a "payment history" for review.
  - c. Enclosed was:
    - i. A Declaration Page Schedule of Coverages from Continental Mutual Insurance Company Account Number **F-0510-4725** detailing Dwelling Insurance with a Benefit Amount of: \$150,000, and
    - ii. **CUSTOMER ACCOUNT ACTIVITY STATEMENT** dated 02.21.2017 describing the payment activity from 04.01.11 to 02.21.2017.
- 242) Beneficiary May E. McCloud in 2011 was 76 years old with a total monthly income of **\$1,441.00** U.S. Dollars.
- a. On all mortgage payment history documents, including the Mortgage History Ledger, Vera L Jones was not listed.
  - b. Vera L Jones did not appear on any of the mortgage payment documents as a borrower or on the home insurance documents as a customer.
  - c. Vera L Jones did not appear on any of the NOTE documents.
  - d. Page 13 of 13 had a copy and pasted signature of Ms. Jones and her name was missing in the space where her name should have been written as having "appeared" before the Notary.
  - e. All documents solely contained the name of MAY E MCCLOUD and the addressed premises as:

**1361 S. 46<sup>th</sup> Street, PHILADELPHIA, PA 19143.**



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- 243) On **01.18.2017** LOANCARE, LLC forwarded correspondence to May E. McCloud C/O VERA JONES, 1818 S. Alden Street, directed regarding alleged Loan Number: 0503182676 regarding Property Address: 1361 S. 46<sup>th</sup> St. PHILAELPHIA, PA 19143”.<sup>73</sup>
- 244) On **01.19.2017** a Complaint was filed with the Bureau of Consumer Protection against FlagStar Bank, File Number: BCP-17-05-000815 regarding the alleged mortgage loan because RLH Ma’at Law & The Rights of Indigenous Peoples knew predatory lending and fraud was prevalent and this was a clear case of it.
- 245) The Bureau of Consumer Protection failed to respond appropriately and failed to investigate the matter.
- 246) On **01.31.2017**, correspondence from FlagStar was directed to MAY E. MCCLOUD, C/O VERA JONES, 1818 S. ALDEN STREET regarding Mortgage Loan #: 0503182676 for Loan dated: April 14, 2011 instructing **“TO RECEIVE HELP WITH YOUR MORTGAGE, YOU MUST ACT BY: 30 DAYS FROM THE DATE OF THIS LETTER”**.
- 247) On **02.06.2017**, correspondence was forwarded. from RLH Ma’at Law to FlagStar and LoanCare, LLC regarding harassing phone calls directed solely to May E. McCloud during the day, night and weekends regarding the continued attempts to extort FIAT from May E. McCloud under the guise of a fraudulent mortgage,
- 248) On **02.06.2017**, the Federal Trade Commission Bureau of Consumer Protection, PA Office of Attorney General (Bureau of Consumer Protection), Pennsylvania Department of Banking and Securities, and the Internal Revenue Service (Division of Fraud and Identity Theft) were all carbon copied the correspondence directed to FlagStar and LoanCare with enclosures regarding their fraudulent actions.<sup>74</sup>
- 249) On **February 27, 2017**, subsequent numerous requests and correspondence submitted by either beneficiary Vera Jones El, or representatives on behalf of 1361 S. 46<sup>th</sup> Street, Flagstar provided correspondence addressed to *Office of the Pennsylvania Attorney General*, which enclosed:
- a. Note,
  - b. Deed of Trust, and
  - c. Payment History.<sup>75</sup>
- 250) The correspondence Note failed to contain Ms. Vera L. Jones’ name, even if she was the BFP owner of the Res.

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<sup>73</sup> See, attached Exhibit “HH “.

<sup>74</sup> See, Attached Exhibit “LL” .

<sup>75</sup> See, Attached Exhibit “ LL“

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- 251) The correspondence failed to contain a “Deed of Trust”.
- 252) Attached to correspondence dated 02.27.2017, page 13 of 13 of the titled “Mortgage” document contained a:
- a. Photocopied signature with hand drawn line and hand printed name of Ms. Vera L Jones, and
  - b. Failed to include Ms. Vera L. Jones’ name on the Notary page as having appeared before the Notary.<sup>76</sup>
- 253) The Mortgage document *prima facially* was forged.
- 254) Further, the 02.27.2017 correspondence failed to include a “Note” initialed or executed by Ms. Vera L. Jones signature and/or initials.<sup>77</sup>
- 255) On **05.04.2017**, correspondence dated **04.27.2020** and forwarded from the PA Attorney General’s Office directed to May E. McCloud regarding an “impasse” concerning the Fraudulent Mortgage matter was received.
- 256) On **03.21.2018** FlagStar Bank forwarded correspondence directly to May E. McCloud, C/O VERA JONES 1818 S. ALDEN ST, PHILADELPHIA, PA 19143-5504 regarding “exploring alternatives” to foreclosure, which included:
- 1) Standard Real Estate Sale,
  - 2) Short Sale,
  - 3) Deed-in-Lieu of foreclosure

There was no signature and contact information included “Flagstar Bank Loss Mitigation Department”.

- 257) At no time did Flagstar provide information evidencing that a lawful Mortgage Note had been executed by both May E. McCloud and Vera L. Jones. Their attention remained focused on May E. McCloud who could neither deny nor affirm that she had voluntarily, knowingly and willingly entered into a mutually agreed Mortgage with the alleged “creditor”.<sup>78</sup> See, **Exhibit “LL” n2017**.
- 258) On December 10, 2018 when Respondents filed a second suit in the Court of Common Pleas Philadelphia County, Respondents’ Attorneys of record fraudulently added “VERA JONES” on Notarized page 13 of 13 of “Mortgage” document,<sup>79</sup>

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<sup>76</sup> See, Attached Exhibit “LL” February 27, 2017 FlagStar Correspondence.

<sup>77</sup> See, Attached Exhibit “LL” February 27, 2017 FlagStar Correspondence and attachments.

<sup>78</sup> All Rights Reserved. At no time does any Petitioners acknowledge any Respondent as a lawful Creditor.

<sup>79</sup> See, attached Exhibit “CCC”.



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which is facially and materially different from the copy previously furnished to the Attorney General's office.<sup>80</sup>

- 259) The Mortgage document provided to the Attorney General's Office and copied to RLH Maat Law and The Rights of Indigenous Peoples presented by Flagstar Bank was materially and substantially different from the copy provided by Michael Bomstein and affiliated/associate Attorneys of record<sup>81</sup> representing Matrix Financial and not Flagstar.
- 260) Attorney Michael Bomstein, of PINNOLA & BOMSTEIN falsified mortgage documents and knowingly presented documents distinguishingly differently from and materially altered to the Tribunal Court.
- 261) Upon notifying the Tribunal and Michael Bomstein and allative attorneys of record of this very factual 'mistake' on their part, Michael Bomstein and the attorneys of record on the matter, instead of correcting the information, filed a Motion for Declaratory Relief, requesting the court to grant their petition to not be required to communicate with Rhashea Lynn Harmon'El, Esq. the Indigenous Trustee and Juris Consul of Guale Yamassee Court who was by contractual agreement representing the Indigenous beneficiaries whom, Plaintiff had maliciously and wrongfully filed suit against. *See, Exhibit "CCCC" 2019 ii.*
- 262) Rhashea Lynn Harmon'El, Esq. is also the daughter of Beneficiary Vera Jones and granddaughter of Beneficiary May E. McCloud.
- 263) Rhashea Lynn Harmohn'El, Esq. since an attempt on her life was made, had become the Trustee of the estates of her Indigenous family and tribe.
- 264) Since the attempt on Rhashea Lynn Harmon'El's life was made, her family had been targeted and attacked by the county of Philadelphia city officials. Michael A. Harmon'El is the paternal father of Rhashea Lynn Harmon'El.
- 265) All Petitioners in this Federal Unconstitutional Claim are Indigenous to America and have generationally been home to the woodlands since being forced from Tsalagi lands during the Trail of Tears.
- 266) In fact, Tsalagi Indigenous also occupied all of the Eastern areas of America. The Iroquois are the first cousins of the Tsalagi.
- 267) The Philadelphia Court of Common Pleas approved Michael Bomsteins' Motion for Declaratory Relief, to not communicate with Rhashea Lynn Harmon'El, Esq. for the

<sup>80</sup> *See, attached Exhibit "LL" 2017.*

<sup>81</sup> *See, attached Exhibit "CCC" Complaint filed Dec 10, 2018 Case ID 18120106*

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matter and moved forward with the case without providing attorney Harmon'El with Notice of the continued proceedings.

- 268) All communications with Rhashea Lynn Harmon'El ceased and a DEFAULT JUDGEMENT was entered against Beneficiaries and mailed to 1361 S. 46<sup>th</sup> Street.
- 269) The acts of the Judges in Virginia and Philadelphia and Massachusetts are all contrary to the Model Code of Judicial Conduct, International law, Constitution and Federal Law and their OATH OF OFFICE.
- 270) The acts of the Attorneys in Virginia and Philadelphia and Massachusetts are all contrary to the Rules of Professional Conduct, International law, Constitution and Federal Law and their OATH OF OFFICE.
- 271) The acts of the Judges in Virginia and Philadelphia and Massachusetts are all contrary to the valid Treaties with the United States.
- 272) The acts of the Judges in Virginia and Philadelphia and Massachusetts are all contrary to International Law regarding Human Rights.
- 273) The acts of the Judges in Virginia and Philadelphia are all contrary to the Guale Yamassee Constitution and Bill of Rights.
- 274) The acts of the Judges in Virginia and Philadelphia are all contrary to the United States Constitution and Bill of Rights.
- 275) When Rhashea Lynn Harmon'El reported the actions to government agencies, all complaints were ignored.
- 276) As Trustee Rhashea Lynn Harmon'El has a duty to the beneficiaries of Guale Yamassee any Court impeding, obstructing or preventing her from defending a matter is in violation of her Trade Rights, Trustee Rights and Human Law Rights, and Constitutional Due Process Rights and Bill of Rights.
- 277) As Guale Yamassee Juris Consil Rhashea Lynn Harmon'El, Esq. has a duty to all members.
- 278) Harmon Rhashea Lynn Trust which is the owner of the properties taken is a secured party under UCC Liens 2019-3031406-99.1 and Respondents have trespassed against Trustee Rhashea Lynn Harmon'El, Esq's interest as Trustee in the Res.
- 279) In her official capacity as Chief Juris Consul, Rhashea Lynn Harmon'El has a duty to advocate on behalf of and represent all clan family, approved for representation.

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- 280) Any law or bill or ORDER denying Rhashea Lynn Harmon'El the right to defend herself and her clan in any suit is unconstitutional.
- 281) The Philadelphia Court of Common Pleas and Pennsylvania Bar Association interfering with Rhashea Lynn Harmon El's duties are a violation of:
- i. Torah
  - ii. Treaty
  - iii. Guale Yamassee Constitution and Code
  - iv. United States Constitution Bill of Rights, Contract Clause and Commerce Clause
  - v. Privileges and Immunities
  - vi. Trade Laws
  - vii. International Law and
  - viii. Human Rights Law.
- 282) Upon the Court Ordering a default judgment, in a matter they had obstructed Rhashea Lynn Harmon'El from partaking, Michael Bomstein and all attorneys of record weazily moved forward with the unconstitutional foreclosure, taking and violation of United States Contract Clause concerning res property 1361 S. 46<sup>th</sup> Street.
- 283) None of the Attorneys in any of the foreclosure matters are licensed to engage in debt collection, or real-estate selling or purchase.
- 284) All of the Attorneys are engaging in a Racket that exists within the legal structure and system just as the "Cash for Kids" scam in Luzerne County, Pennsylvania and so many others that exist.
- 285) All the attorneys are however held to the oaths they took when they became lawyers and that oath included defending the Constitution from foreign and domestic terrorism and to exercise their duties with fidelity.
- 286) Each lawyer and judge listed as a Respondent in this matter through their acts of obstruction and constitutional violations and human rights violations have acted against their oaths and their duties as officers and agents of the Republic, the United States of America.
- 287) At all times, Respondent attorneys of record knew the mortgage documents were fraudulent, forged, facially discriminatory and intentionally and maliciously pushed forward "operation warp speed" without care or concern of the law or their duties, that the foreclosure had been received as a result of them directly altering the mortgage documents, from which they profited.

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- 288) In each fraudulent foreclosure case, Petitioners' Title to property was unconscionably and unconstitutionally stripped from them and converted and transferred with knowledge of falsity and wrongdoing known.
- 289) The attorney working in the recorder of deeds office had knowledge of this falsity and is a part of the "cash for indigenous property" scam.
- 290) All of the takings and trespasses are unconstitutional.
- 291) Attorneys are required in the united states to take an Oath of Office to uphold the constitution and laws of the land, which includes Treaty.
- 292) Michael Bomstein and allative attorneys of record cared only for money and focused to eliminate Attorney Harmon'El from being able to carry out her fiduciary duty to represent May E. McCloud and Vera L. Jones because she had notified the tribunal of the forged documents and had exposed the ponzi scam that had perhaps been taking place as far back and as long as Michael Bomstein had been a member of the BAR or even longer. *See, Exhibit 2Supporting Documents (xvii) Families of Philadelphia and the Unconstitutional Foreclosures.*
- 293) Philadelphia and all the Commonwealths in the United States have a long history of discriminating against marginalized humans.
- 294) Philadelphia through its agents have always been ready, willing and able to do whatever it takes to profit from the continued oppression of the Indigenous and/or marginalized peoples of melanated origin.
- 295) On May 13, 1985, Philadelphia and agents and operatives dropped a bomb killing men, women, and children.
- 296) The City of Philadelphia's agents and operatives have a long history of committing hateful racists acts through terrorism and sanctioned murder.
- 297) All attorneys who entered their appearance followed suit knowing that their evil acts were unlawful and unconscionable and knowing that they were violating their oath to uphold the Constitution, Treaties and Laws of this Land.
- 298) All attorneys who entered their appearance followed suit knowing that their evil acts were unlawful and unconscionable and knowing that the BAR ASSOCIATIONS would be very supportive of their acts.

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- 299) Attorneys have a duty of Candor towards the Tribunal under Rule 3.3 and failing to report law or making a false material assertion of fact to the Tribunal is a violation of said rule.
- 300) Additionally, upon passing the BAR in the united states all attorneys are required to take an Oath of Office and those duties are to be executed with fidelity.
- 301) Upon receiving the evidence of fraudulent signatures and notarized documents, counsel on behalf of Matrix Financial falsified subsequent documents and began to attack Rhashea Lynn Harmon'El, personally, the rightful Trustee of 1361 S. 46<sup>th</sup> Street and Indigenous Representative instead of correcting the false statements asserted in all documents filed and communicated to the Tribunal.
- 302) In fact, on December 10, 2018 Michael Bomstein filed a new suit as an Action to Quiet Title<sup>82</sup> because he knew the documents were fraudulent and laden with legal defects.
- 303) Attorney Michael Bomstein and associates and affiliates of record through ENTRY OF APPEARANCES filed a Motion to not be required to communicate with or accept any documents from Rhashea Lynn Harmon'El, Esq.
- 304) The Tribunal upon being notified of said documents produced as evidence presented by the party-opponent, ignored the notice and denied the Motion filed on Behalf of May E.McCloud and Vera L. Jones.<sup>83</sup>
- 305) In all instances, the courts, through intentional human rights violations and acts of high prejudice and discriminatory conduct and malfeasance denied defendants all rights and access to launch any opportunity to defend themselves against all alleged *creditors* directly and through their attorney representatives.
- 306) At all times, the Attorneys and Judges, members of the BAR, acted to obstruct access to the courts to respond and litigate and prove the mortgage was fraudulently contrived, through clerks (as lawyers), judges, lawyers (as Attorneys) and other colonial personnel who facilitated the unconstitutional acts of hindering and obstructing access to filing documents, preventing access to court, dismissing credible claims and issuing Orders and Decrees blatantly abusing their discretion and terribly erring in law.
- 307) At all times the Tribunals through its court clerks, judges and other officers of the courts including attorneys of record ignored factual evidence that *prima facially*

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<sup>82</sup> See, Exhibit "CCC" Attached.

<sup>83</sup> See, Case records.

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evidenced genuine issues of material fact that any reasonable person would raise and eye of suspicion.

- 308) The attorneys involved in the representation of Respondents listed in this claim are notoriously known lawyers, law firms, and mortgage companies that work together and are in the business of trespassing and dispossessing Indigenous population of their property for profit.
- 309) Fraudulent foreclosures are crimes in the united states, yet ignored when they happen against Indigenous or the so called “minority” groups.
- 310) All parties’ acts in dereliction of their duty have consistently resulted in the loss of thousands and perhaps millions of Indigenous peoples lives in the original 13 Colonies.
- 311) It is a human rights violation to engage in acts that amount to forcibly removing individuals and groups of a particular ethnicity from their home and their land.
- 312) It is a violation of all States, which includes the government agencies, corporations of that State to engage in dispossession property from Indigenous people.
- 313) All Treaties entered by the ancestors of the currently remaining Indigenous, whether they know they are Indigenous to the land of America or not, were promised the protection of the government in return for their 1) surrender and 2) land.
- 314) All government agent operatives have failed to uphold that agreement and instead have worked to disenfranchise and oppress to the advantage of whites.
- 315) Proceeds from the land grabs are put into the coffers of the city and line the pockets of those engaged in the Indigenous Ponzi Racket Foreclosing and Eminent Domain Scheme.
- 316) The blatant unconstitutional acts committed by the government agents and their employees and third party- private mortgage, title and law firms is a continued display of governmental systemic racism and prejudice and discrimination existing within the colonial legal system that directly violates general human rights laws that exists internationally and that are imbedded within the united states constitution.
- 317) The government operatives of the Commonwealth of Massachusetts followed the same pattern and occurrence and strategy in the 50 Lovell Road Res.



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- 318) At all times, the Agents of the former colonial colonies engaged in malfeasance and passive aggressive war tactics against Indigenous to continue displacing them and moving them from their lands without just compensation.
- 319) Case 475-MD2017 was filed as an Application for Relief per Pa.R.C.P. 123 requesting that the Court intervene and mandate that the Philadelphia Court of Common Pleas clerk's office cease obstructing access to justice.<sup>84</sup>
- 320) Case 475-MD2017 was arbitrarily and summarily dismissed without providing any legal reasoning.
- 321) Each case filed by Respondent Attorneys, was arbitrarily dismissed without providing any legal reasoning and allowing for the Attorneys to move forward with obtaining DEFAULT JUDGMENTS.
- 322) Each DEFAULT JUDGEMENT was obtained with the direct intention and through the unconscionable acts of each Attorney and Judge obstructing access to Petitioner's rights to a DEFEND, RESPOND, and REBUT any and all allegations asserted.
- 323) The courts through their AGENTS have operated as the liaison in the ponzi scheme that smoothly connects the criminals and facilitates their evil acts to completion.
- 324) DEFAULT JUDGEMENTS are then submitted to the Prothonotary ORDERING the Prothonotary to ISSUE A WRIT OF POSSESSION.
- 325) The Write of Possession is then, forwarded to the Sheriff's offices of the Commonwealths for which all are agents and operatives working against Indigenous.
- 326) The unlawful taking occurs and all Agents involved feign "I am just following Orders" as if there is no duty or responsibility for their part in the Racket.

**IX. LEGAL OBLIGATION**  
**TO REVIEW INDIGENOUS CASES WITH INTEGRITY AND HONOR**

- 327) The above paragraphs are incorporated as fully referenced and set-forth herein.
- 328) In *Seminole Nation vs. The United States*, The Supreme Court recognized and noted that "the United States has a 'moral obligation of the highest responsibility and trust to [Indigenous] and 'must use 'great care' in dealings with them".<sup>85</sup>

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<sup>84</sup> See, *Exhibit "UU" Attached*.

<sup>85</sup> See, STEPHEN L. PEVAR, 4<sup>TH</sup> Edition, *THE RIGHTS OF INDIANS AND TRIBES*, 327 (2012) citing *Seminole Nation vs. United States*, 316 U.S. 286, 297 (1942) and *United States vs. Mason*, 412 U.S. 391, 398 (1973).

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- 329) Any government action harmful to [Indigenous] interests must be judged using the ‘most exacting fiduciary standards’.”<sup>86</sup>
- 330) The United States has a **Fiduciary Trust Responsibility** to Indigenous Peoples and on numerous occasions the Supreme Court has acknowledge and reiterated the **Doctrine of Trust Responsibility** on behalf of the Federal Government to Indigenous People.<sup>87</sup>
- 331) The trust relationship originates from nearly **400 treaties** the United States alone entered with the Indigenous between 1787 and 1877.<sup>88</sup>
- 332) Under the Treaty of Hopewell executed in 1785 with the Original melanated Tsalagi-Chelokee (Cherokee) Nation, peace was guaranteed “to all Cherokees” and promises were incorporated “to receive them into the favor and protection of the United States of America”.<sup>89</sup>
- 333) Indigenous Tribes were recognized as Sovereign Nations by European countries that began settling and colonizing American Lands and Treaties, such as the Treaty of 1730 between the British Empire and the Cherokee, were entered.<sup>90</sup>
- 334) Thus, the Supreme Court noted in 1823 “[Indigenous] tribes, were regarded by the Nation of Europe and by the United States as ‘distinct, independent political communities, retaining their **original natural rights**’ and therefore, ‘ranked among those powers capable of making treaties’.”<sup>91</sup>
- 335) Under the Constitution of the United States of America, federal treaties, is ‘the supreme law of the land’ and therefore, are “superior to state constitutions and state laws and state policies.”<sup>92</sup>
- 336) Under U.S. Constitution Article VI §2: “This Constitution and the laws of the United States, which shall be made in pursuance thereof; and **all Treaties** made or which shall be made, under the Authority of the United States, **shall be the Supreme Law**

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<sup>86</sup> *Id.*

<sup>87</sup> See, *United States v. Jicarella Apache Tribe*, 131 S.Ct. 2313, 2324 (2011), citing *United States vs. Mitchell*, 463 U.S. 206, 225 (1983) and *United States v. Navajo Nation*, 537 U.S. 488, 490 (2003) “acknowledging the general trust relationship that exists between the federal government and [Indigenous] Tribes”.

<sup>88</sup> See, STEPHEN L. PEVAR, 4<sup>TH</sup> Edition, THE RIGHTS OF INDIANS AND TRIBES, 30 (2012)

<sup>89</sup> See, *Treaty of Hopewell*.

<sup>90</sup> See, *Treaty of Peace and Friendship Between the British Crowne and Chelokee Nation and Renewed 1791 Treaty of Holston Between the United States of America and the Cherokee Nation*.

<sup>91</sup> See, STEPHEN L. PEVAR, 4<sup>TH</sup> Edition, THE RIGHTS OF INDIANS AND TRIBES, 45 (2012) citing, *Worcester v. Georgia*, 31 U.S. 515, 519 (1832).

<sup>92</sup> See, U.S. Const. art. VI §2: “This Constitution and the laws of the United States, which shall be made in pursuance thereof; and all Treaties made or which shall be made, under the Authority of the United States, shall be the Supreme Law of the Land; and Judges in every State shall be bound thereby any Thing in the Constitution or Laws of any State to the Contrary Notwithstanding.”



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***of the Land; and Judges in every State shall be bound thereby any Thing in the Constitution or Laws of any State to the Contrary Notwithstanding."***

- 337) The United States Constitution, 5<sup>th</sup> Amendment provides that Congress may not deprive *anyone* of private property without just compensation. If Congress cannot deprive *anyone* of private property, then neither can the State or the agents of the colonial united states.
- 338) In every instance herein, Petitioners have been deprived of their property without just compensation, which has been based upon Fraud.
- 339) In every instance herein, Petitioners have been fraudulently accused of owing a debt that was fraudulently contrived through Racketeering and Organized Criminal Organizations that exists within the United States Federal Government, United States Subsidiary State Affiliate Organizations and United States Legal Institutions and Organizations responsible for the regulation and licensing of Attorneys, Judges, and Businesses.
- 340) The Guale Yamassee Compliance Department has found pervasive and ongoing malfeasance existing with the Commonwealth's governmental structure publicly and privately and the Federal governmental structure.
- 341) All Petitioners, beneficiaries and Trustees have suffered direct and irreparable financial harm as a result of fraudulent property takings, trespasses, interferences, dispossessions and terroristic stalkings and threats through use of the United States Postal Service.
- 342) All Respondents have engaged in the unconstitutional acts of depriving Petitioners and the Guale Yamassee Mund Bereefan Clan Nation of their right to peaceably be left alone to enjoy their life, liberty and property.

**X. BACKGROUND**

- 343) Petitioners are indigenous to the land of North America, and originate from the Tsalagi Nation, which has over 10,000 years of History.
- 344) Petitioners, are the descendants of the Tsalagi Nation, and are the beneficiaries of all Treaties entered between Britain, The United States and the Tsalagi Nation.
- 345) Petitioners, currently are clan family of the Guale Yamassee Indigenous Native American Association of Nations.
- 346) Petitioners are members of a protected class, afforded by the Constitution of the United States and are therefore, the responsibility according Treaty Agreements of the Federal and State Government.

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- 347) Treaty protects Petitioners to freely engage in trade and commerce without restraint.
- 348) Policies and corporate rules are not designed to impede Indigenous from engaging in trade and commerce.
- 349) Yahuah's real property and land gifted to the Tribe of Yashar'el upon their escape from Mitzraiym, have been targeted by Respondents identified as united states agents and public officials through ongoing and continuous trespassory acts that have caused irreparable harm and leaving Petitioners financially deprived and once again homeless.
- 350) Petitioners through birthright are the original owners, jointly owned with all other Indigenous peoples, of land gifted them from their Elohiym.
- 351) Genesis states: "in the beginning, Elohiym created the heavens and the earth".
- 352) Petitioners, possess original land patents to land in North America and are the beneficiaries of the land, despite any brick and mortar obstructions built upon the land and claimed to be owned by allative colonial foreign entities and colonial foreign agents.
- 353) Petitioners have a fundamental right to food, clothing and shelter and these rights are inalienable as indicated in TORAH and the Constitution.
- 354) Petitioners, upon receiving notice of the claims: 13-17599 Prince William County, 170503419 Philadelphia County, Writ 1511-4197, 18120106 Philadelphia County, 03972 Control No. 16095058 Philadelphia County, attempted to respond timely and had/have been obstructed by government agents, officers of the court and other people denying access to respond timely and effectively in effort to cause default judgments for extortionary purposes.
- 355) Further, when Petitioners' inquired for assistance as per information contained in the Notice of Claim packet, at all times, Respondents informed Petitioners' beneficiaries that the only assistance they could provide them was to "help them make a payment".
- 356) Petitioners assert that all times, Respondents engaged in fraudulent misrepresentation of material facts. **See Philadelphia's Mortgage Foreclosure Diversion Program.**
- 357) Respondents are the business of instituting Eminent Domain power against Indigenous and defrauding them:
  - i. Out of FIAT, or

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ii. Real and Personal Property.

- 358) Respondent Agents, because they engage in trade and commerce that relies on FRAUD, are engaged in a Racket called the Legal Justice System.
- 359) Petitioners assert that at all times, Respondents engaged in intentionally falsifying information.
- 360) Petitioners assert that at all times, Respondents engaged in intentionally falsifying documents.
- 361) Petitioners assert that at all times, Respondents engaged in intentionally falsifying notarizations and/or self-notarizing documents.
- 362) Petitioners assert that all times, Respondents engaged in fraudulent mortgage presentments.
- 363) Petitioners assert that all times, Respondents engaged in fraudulent assertion of contracts, when no legal contract, legal agreements, or legal mortgages existed.
- 364) Before there is a contract, the elements of a contract must first exist.
- 365) All Respondents have taken an oath to uphold to defend and protect the Constitution of the United States against domestic and foreign nations.
- 366) If Respondents are against the Constitution and they operate with the intent of overthrowing the Constitution, then they have committed Treason.
- 367) All Respondents, serving as agents, and citizens of the United States operating through corporations *et cetera* have taken an oath to uphold and protect the public following rules of ethics.
- 368) Respondents, since some unknown time, have been acting as if their public positions are their private *personal* criminal enterprises and businesses and have engaged in self-dealing on a grand scale which includes the cooperation of various agents within the government structure.
- 369) Respondents, since some unknown time, have been acting within their public capacity to abuse the people and trespass against real property of Petitioners.
- 370) Respondents, since some unknown time, through use of their public positions, have misused and abused their positions for their personal gain and have refused and failed to uphold the just function of their offices.
- 371) Petitioners responses have all been obstructed through denial of access to the courts.

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- 372) Respondents are using the courts and the government agencies to funnel and orchestrate their unlawful and tortious acts against Petitioners.
- 373) At all times, the courts in which matters have been asserted by Respondents, have ignored, arbitrarily dismissed and unlawfully abused their discretion Ordering Sheriff's sales against Petitioners.
- 374) At all times, Respondents have engaged in acts of Threat, duress and coercive tactics to obtain payment and property unlawfully.
- 375) Respondents have systematically established a system that misleads Petitioners, once they are sued in foreclosure actions, to believe they are there to help them through the mortgage process and when they appear, they are there to ensnare and trap them like prey into giving up their property or making payments they never agreed to make or were required to make from the inception.
- 376) Respondents in all cases do not possess legal or rightful title to possession of real property but are engaged in a modern day "land grab", fraudulent deed ponzi scheme and forced removal from the land against Indigenous throughout the United States.
- 377) The Federal Government, *knowingly*, funds organizations, that Respondents operate through, that present themselves as servicing the public to help in Fraudulent Mortgage Foreclosure schemes,
- 378) Petitioners have informed Respondents, that they are Indigenous, and that all of the property they have alleged to have an interest, is in a Trust operated by Gule Yamasee Nation or one of its officials, through its government departments, on behalf of its Tribal families and therefore possess no legal right or standing to interfere with the governmental business of the Nation directly or indirectly.
- 379) Respondents intentionally have ignored any facts and documentary evidence presented by Petitioners, and knowingly have denied Indigenous Trustees the right to appear, defend and access the courts.
- 380) Respondents, possessing knowledge of the Indigenous Trustees, have intentionally and knowingly failed to notice the true owners (Trustees) and/or representors of the property.

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- 381) Respondents refuse to deal with the true owners of property and expect for Indigenous to just “move along” and allow for them to continue trespassing and dispossessing them of their property as their colonial forefathers had done.
- 382) Whomever is listed as “tenants” and “occupants” and “beneficiaries” are not the owners of the properties herein this claim.
- 383) Petitioners are unawares of any individuals known as Tenant or Occupant or John Doe at any of the Res.
- 384) When Petitioner, Trustee Rhashea Lynn Harmon’El requested and inquired through Requests for Production of Documents of an accounting and evidence of the funds provided,, Respondents NEVER responded or complied with the Discovery Requests.
- 385) Additional time was requested through a Motion by Petitioners and the Motion was DENIED.
- 386) Petitioners understand that when loans are granted and other financial contracts involving bank funds, a financial paper trail regarding those transactions is created.
- 387) Respondents are also aware that during the foreclosure crisis that those primarily affected by the predatory lending and housing mortgage crisis were *minorities* who are the Indigenous.
- 388) At all times and in every case presented herein, Respondents have refused to provide the financial paper trails to support their asserted contentions that they are entitled to “payment”.
- 389) At all times Respondent courts have failed to accept and justly consider any and all evidence presented against Respondent entities and Respondent attorneys.
- 390) Respondents receive favored treatment by courts.
- 391) Within the colonial legal system, exists the ringleaders of fraud and predatory lending sanctioned by the BAR Associations licensing the AGENTS to conduct business as usual routine unconstitutional transactions.
- 392) Respondent courts provide Respondent entities’ agents and Respondent attorneys with cart blanche abilities to violate constitutional rights of Petitioners.
- 393) Respondents have received thousands, worth billions of dollars from Sheriff Sale properties through malfeasance acts committed by Respondents, and others not party to this Action.

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- 394) Respondents have falsely and tortiously profited from thousands of Sheriff Sale properties through malfeasance acts committed by Respondents in this Claim, and others not party to this claim.
- 395) Respondents and their colonial cohorts systematically engage in unconstitutionally converting property and evicting people from their homes solely for greed and profit.
- 396) Respondent Judges have engaged in numerous acts of arbitrarily denying and dismissing cases leaving scores of Indigenous with no where to turn except living in the streets.
- 397) Respondent Judges have notoriously abused their discretion as judges in the cases that have caused this matter to be brought before the Eastern District of Va and the FCC and other Courts and venues where the actions will receive international attention.
- 398) Respondent Judges, knowing fraud has occurred, have unjustly and unconstitutionally and unlawfully, ordered Petitioner beneficiaries to pay and place into escrow unwarranted significant amounts of funds, despite approving *In Forma Pauperis* Petitions, allegedly due, knowing Petitioners owed nothing and when Petitioner's could not pay, dismissed the case and issued judgments and default judgments against Petitioners.
- 399) Respondents schematic is to frustrate, harass, obstruct and cause exhaustion through intentional infliction of emotional distress to the point that Indigenous either:
- i. Submit and pay, or
  - ii. Give up and abandon the Res, and/or
  - iii. Are physically forced, threatened and placed under duress to leave and abandon legally and rightfully their homes, through default judgments and evictions using the process created through their colonial legal system.<sup>93</sup> or
  - iv. Killed for the property.
- 400) Respondents intentions and acts have included causing and placing Petitioners in positions of financial constraints so as to advance beyond reproach.

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<sup>93</sup> See, *Abuse of Process* at: <https://legal-dictionary.thefreedictionary.com/abuse+of+process>. (site last visited 12.17.2020).

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- 401) Respondent Judges have approved of Motions approving attorneys hired by alleged Mortgagee to not communicate with the Trustee or other legally interested party possessing standing beyond being a mere asset to extort yearly dues.
- 402) Respondents have engaged in numerous acts of preventing documents from timely being accepted and filed electronically and in person.
- 403) Respondents have intentionally engaged in tactics that mimic the Racketeering business of the mafia by using the justice system as a tool to threaten, coerce and place Petitioners Beneficiaries under extreme duress.
- 404) Respondents have intentionally engaged in tactics to place and cause Petitioners to experience extreme emotional distress.
- 405) Respondent courts herein operate as a criminal and corrupt enterprise because the agents who represent the Court are engaged in the business of stealing Indigenous Peoples property and breaking each other off a cut of the booty and prize acquired.
- 406) Respondents have all profited from underselling and/or upselling above the fair market price and not conveying the proceeds to Petitioner the remainder from their unlawful sales and conversion of property.
- 407) Respondents engage in their illegal activities and then fail to report the income and real value of property acquired or realized to the IRS.
- 408) At no time, have any of the Claimant's homes been sold for Fair Market Price and Trustees received payment from any residual despot.
- 409) At all times, Petitioners have failed to contact Trustees, pretending as if Trustees do not exist when lawful private agreements and sales among the Indigenous have occurred.
- 410) At no time have any of the Petitioners' received equity remaining after the prize and booty had been divided amongst the Respondents because the Agents are operating as private privateers under the Authority of the Abolished Doctrine of Discovery.
- 411) Claimant beneficiaries have been left homeless or left under the threat of impending threat of eviction by the Sheriff or Police who kill Indigenous people at will and without recourse or protection as promised by Treaty in this United States.



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- 412) Respondents have actively and intentionally engaged in presenting fraudulent documents by copying and pasting signatures and affixing initials of Claimant beneficiaries.
- 413) Claimant beneficiaries are not the owners of the property in the alleged mortgage agreements.
- 414) Respondents have successfully evaded answering interrogatories regarding the validity of the contracts/mortgage documents.
- 415) Respondent attorneys and judges have intentionally ignored the laws of Contract and Jus Cogens to turn a profit at the disadvantage of the Trustees and beneficiaries.
- 416) Petitioner Trustees owes a fiduciary duty to the Nation, Clan and beneficiaries and Respondents have unlawfully interfered with the contractual relationship that exists between the Claimant Trustees and beneficiaries, choosing to solely deal with beneficiaries who are unaware of the laws of property, banking and mortgages.<sup>94</sup>
- 417) Respondents have knowingly engaged in fraud through continuous and ongoing acts of forging signatures or adding signatures subsequent Notarizing documents.
- 418) Respondents, in each case have perfected the strategy of contriving fraudulent documents and then selling the documents as real “legal tender” and “promissory notes” to third parties and then “assigning” the mortgage to subsidiary entities owned by the original parent corporation.
- 419) At all times Respondents have failed to attach any substantive and evidentiary relevant documents substantiating their lawful relationship and rightful claim as a Creditor-Lender against Petitioners-Beneficiaries.
- 420) Respondents have fired or terminated or dismissed employees who have begun to investigate the malfeasance acts of Attorneys and institutional operatives.
- 421) At all times Respondents have refused to deal with the Trustees and rightful owners of the estates.
- 422) Respondents solely want to deal with, infirm, invalids, elderly, and anyone who does not understand the legal system.

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<sup>94</sup> See, Exhibits “SSS” “UUU”, “XXX”.

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- 423) Respondents' entities and attorneys, through assistants from the judges, arrogantly present superior rights of claim and ownership to *In Rem* Property and then deny being required to produce documentary evidence to support such assertions.
- 424) The arrogance of Respondents stems from years of ongoing and systemic malfeasance acts committed against the Indigenous and never being reproached or indicted for their malfeasance acts.
- 425) Respondent's colonial entities and attorneys in each matter have utilized the colonial legal system through conspiratory agreements and associations and affiliations with Judges, Lawyers, Clerks and other agents and officers in positions of authority and power within the colonial legal system to successfully and systemically excel their unconstitutional acts that violate the human rights of Indigenous Petitioners.
- 426) In all ponzi scams an agreement must exist with other parties for the scam to work successfully.
- 427) Respondents' entities and attorneys, through assistants from the judges, arrogantly present superior rights of claim and ownership to In Rem Property and then deny having to deal with the Trustees and lawful owners of the property.
- 428) Respondent banks are required by law, not under color of law, to maintain records of money transactions.
- 429) At all times, Respondents have been unable and/or unwilling to produce copies of checks or records evidencing that funds asserted "loaned" and "owed" were in fact transferred and presented and accepted by Trustees of the property.
- 430) At all times, Respondents' Complaints filed in Court were defective according to each States' procedural laws and included non-applicable boilerplate language to give the appearance of legitimate standing to engage in the business of theft of property and harassing legitimate real property owners.
- 431) The cookie cutter complaints facilitated the fraud to be conducted with ease by Attorneys business structures that primarily relied upon the fraud to successfully continue to function and operate.
- 432) At all times, Claimant asserts, that Trustees are the true owners of the real property Res and that Respondents. in total are operating under *color of authority* and are

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utilizing, through collusion, the Court System as a means to advance its unlawful objectives.

- 433) Lawfully, a Deed does not supersede Land Patents regardless of how many times the deed is transferred or sold. Indigenous people are the original land patent owners.
- 434) In the matters herein, allative Deed Transfers were construed under the guise of lawful deed transfers, involving United States associate agencies, states and commonwealths.
- 435) Petitioners are the lawful and rightful possessors of the Land Patents and if Respondents choose to assert rights superior to the land/structures then Respondents lawfully must deal with the Indigenous Trustees of the Estates and not the Indigenous beneficiaries of the Estate.

**CLAIM I**  
**FRAUDULENT FORECLOSURES**

- 436) The aforementioned paragraphs are incorporated as though fully referenced and set-forth herein.
- 437) Fraudulent Mortgage Foreclosures in Pennsylvania is a federal crime.
- 438) Under Virginia Code § 18.2-186, a person is guilty of the crime of committing a fraudulent foreclosure by:
  - i. Making any materially false statement,
  - ii. Knowing it to be false and intending that it be relied upon,
  - iii. For the purpose of procuring personal property, cash, or credit.
- 439) Fraudulent foreclosures in the United States is a Federal Crime.
- 440) The Department of Justice is aware of the increase in fraudulent mortgages and foreclosures that include:
  - i. Predatory loan lending;
  - ii. “[G]amed system” designed to embezzle funds;
  - iii. Bid rigging rings; and
  - iv. Public Foreclosure Fraud.
- 441) Respondents utilize the MERS system to engage in unlawful mortgage lending schemes that involve the entire judicial system throughout the entire United States for the success of the scam.

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442) The motivation behind fraud for profit is money and is often committed with the **complicity of industry insiders** such as:

- i. Mortgage brokers,
- ii. Real estate agents;
- iii. Property Appraisers;
- iv. Settlement Agents (attorneys and title examiners).

443) Typically fraudulent activities concerning fraud for profit include:

- i. Appraisal fraud;
- ii. Fraudulent flipping;
- iii. Straw buyers; and
- iv. Identity theft.

444) The United States has experienced a substantial and rapid growth in mortgage lending fraud.<sup>95</sup>

445) From 1997 to 2005 mortgage loan fraud increased by 1,411 percent.<sup>96</sup>

446) In 2006 the mortgage fraud trend continued to increase with 7,093 reports filed on suspected mortgage loan fraud.<sup>97</sup>

447) The increase from 2005 to 2006 was at 35% over the Suspicious Activity Report Analysis (SAR) filings.<sup>98</sup>

448) Mortgage loan fraud is divided into two (2) categories:

- a. Fraud for property, and
- b. Fraud for profit.

449) Fraud for property involves material misrepresentation or omission of information with the intent to deceive.

450) Retired and elderly persons have been the target of this fast growing crime in the United States with the exploitation of seniors and other easily targeted prey, such as marginalized people.

451) FinCen reports that the type of loan falsifications leading to Fraudulent Foreclosures include:

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<sup>95</sup> See, attached, 3 Supporting Documents Suspicious Activity Report Analysis xiv.

<sup>96</sup> *Id.*

<sup>97</sup> *Id.*

<sup>98</sup> *Id.*

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- i. Altered bank statements, and
  - ii. Mortgage brokers using the identifies of prior customers to obtain loans for customers who were otherwise unable to quality.
- 452) Misuse of **FHA Title One Loans** have been used to lend funds for
  - i. Debt consolidation;
  - ii. Cash out;
  - iii. Or any home related expenses, or
  - iv. Luxury items such as swimming pools and hot tubs.
- 453) Appraisal fraud and property flipping involves collusion of mortgage brokers, appraisers, borrowers, and/or real estate agents and brokers.
- 454) Collusion participants are often lawyers wearing many hats who abuse their positions and status within the public.
- 455) Respondents, have at all times when inquiry was made regarding the legitimacy of the mortgage, sent the hound dogs out to destroy and oppress and suppress those inquiring.
- 456) The hound dogs function as “assassins” in a Mafia.
- 457) Respondent Attorneys in Pennsylvania, Massachusetts and Virginia have all utilized the exact court processes to keep quiet and shut out any possibility of questioning or investigation into the fraudulent mortgage documents and subsequent fraudulent mortgage foreclosures.
- 458) Respondents intentional acts include:
  - i. Acting with the intent to misrepresent material facts and information with the mortgage application process;
  - ii. Acting with the intent to misrepresent material facts and information within the Mortgage agreement.
  - iii. Acting with the intent to misrepresent material facts and information within the Note agreement.
  - iv. Acting with the intent to defraud Petitioners through the Note Agreement.
  - v. Acting with the intent to cause vapid confusion through numerous assignments with third-party non-original contracting parties.
  - vi. Acting with the intent to obstruct access to the courts, counsel, representation, and the ability to face accusers.
  - vii. Acting with the intent to cause harm and injury to Petitioners through acts of threats, duress and using coercive measures to force Petitioners to submit to the scheme.
  - viii. Acting with the intent to exploit the Indigenous elder population, where elders are persecuted to sign loan documents without understanding

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borrower rights and responsibilities under applicable federal and state laws.

- ix. Acting with the intent to remove any reasonable amount of time for borrower to review loan documents and encouraging at closing by attorneys to sign and initial documents without reading the contract or boilerplate language.
- x. Acting with the intent to contract with indigenous people in violation of federal law and cause obstructions to State and Federal Court within the particular jurisdiction, upon any disagreements or inquiries regarding the documents that proximately leads to the harm and injury of Indigenous individually and as a Nation.
- xi. Acting with the intent to target Indigenous population to profit from committing theft and trespasses of homes, forced physical evictions, and displacement.
- xii. Acting with the intent to cause terror and place in imminent apprehension of immediate harmful and/or offensive contact through use of force by the Sheriff's office or other military agency utilized to assist in the removal of Indigenous from their property even if it means death.

459) At all times Respondents have failed to act in accordance with their Oath of Office and Fiduciary duty.

460) See, Attachments and Exhibits "D" "F" "H" "J" "K" "L" "O" "P" "Q" "R" "V" "W" "X" "DD" "EE" "LL" "QQ" "WW" "XX" "YY" "AAA" "BBB" "CCC" "DDD" "JJJ" "KKK" "LLL" "MMM" "NNN" "OOO" "PPP" "QQQ" "RRR" "VVV".

461) Paragraphs 265 to 289 summarizes excerpts from Mortgage Loan Fraud Report conducted and assessed by FinCen and factually connected to the acts committed by Respondents against Petitioners.

462) Paragraph 288 attachments and exhibits collectively (although not exhaustively) substantiates the mortgage foreclosure fraud that are not an isolated incidences, but one that is ubiquitously occurring and harmfully injuring and detrimentally affecting the Indigenous population and Nation as a whole.

**CLAIM II**  
**COMMAND RESPONSIBILITY**

463) The aforementioned paragraphs are incorporated as though fully referenced and set-forth herein.

464) Command responsibility is a jurisprudential doctrine in international law permitting the prosecution of military commanders for war crimes perpetrated by their subordinates. The first legal implementations of command responsibility are found in the Hague Conventions IV and X (1907).

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- 465) Respondents Pennsylvania, Virginia, and Massachusetts have taken oaths to uphold the United States of America Constitution.
- 466) Respondents Pennsylvania, Virginia, and Massachusetts are responsible and obligated to enforce international law and principles which are incorporated and codified in the United States as well as the Code of Federal Regulations.
- 467) Respondent agents, public officers and officials acted with knowledge of violative and malfeasance acts committed against Petitioners.
- 468) Respondent agents acted, with knowledge of city planning to eliminate Indigenous from certain areas and lands for "poverty reduction" warp speed plan.
- 469) Respondent agents collaborated with land developers and judicial officers to engage in fraudulent foreclosure practices that would lead to necessary use of military force to remove Indigenous from their lands. (Exhibit "Q")
- 470) The Sheriff's Office is an arm of the military, carrying and possessing deadly firearm that will cause severe and permanent injury leading to death of Indigenous peoples.
- 471) Orders were issued by the affiliate Commonwealth Courts to remove Indigenous from their land for monetary profit and gains on behalf of the colonial legal system.
- 472) The Sheriff and other officers of the government have blindly "followed orders" given by their superiors.
- 473) The Sheriff and other officers of the government are aware of their duties to the public and for the sole purpose of receiving a paycheck have ignored justice.
- 474) The Nazi war trials at Normandy determined that blindly following orders that leads to the destruction, eradication or forced extermination of a targeted people group is not a defense to crimes leading to serious harm and injury resulting therefrom.
- 475) The foreclosure scheme is a plan that has been developed to eradicate, destroy, remove, displace, exterminate and scatter the remnant of Indigenous of today just as the Trail of Tears was designed.
- 476) The Foreclosure scheme is a violation of international law, the Geneva Convention and Hague Convention on War Crimes.
- 477) The Foreclosure scheme is a violation of Treaty Laws protecting the rights of Petitioners. (See Exhibit "UUU" and "XXX" and "Supporting Documents Gualle Yamassee Constitution (i)")



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- 478) All Respondents have a fiduciary duty and responsibility to protect and uphold the Constitution, treaties and laws of the United States.
- 479) The Constitution, treaties and laws of the United States supersede any State local laws, rules, policies that violative of Treaty and Federal laws.
- 480) The acts Respondents have engaged are a direct violation of their oath of offices, treaty, and fiduciary responsibilities to Respondents.
- 481) Paragraphs 291 to 306 summarizes the laws and violations of those acts committed by Respondents against Petitioners.

**CLAIM III**  
**BREACH OF UNITED STATES CONSTITUTION**  
**CONTRACT CLAUSE (BREACH OF TREATY)**

- 482) The aforementioned paragraphs are incorporated as though fully referenced and set forth herein.
- 483) A contract requires, offer, acceptance, mutuality of assent and consideration, which forms the "Agreement". These are the fundamental elements of establishing a contract and all licensed, practicing or authorized lawyers and attorneys Judicially know this.
- 484) All Petitioners are Indigenous and as a result, the Federal Government has jurisdiction over matters concerning Indigenous, whether federally recognized or not.
- 485) The Contract Clause and Eminent Domain Clause of the united states constitution, "the two clauses have been united by a single, yet general ideal: Government ought not to be permitted to redistribute resources by 'taking' resources from one person for the benefit of another."<sup>99</sup>
- 486) "The Contracts Clause bars state government from disrupting voluntary agreements, because government wants to help one or another side."<sup>100</sup>
- 487) "The Eminent Domain Clause bars the federal government (and after incorporation, the states as well), from taking property from one person and giving it to someone else."<sup>101</sup>

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<sup>99</sup> STONE, SEIDMAN, SUNSTEIN, AND TUSHNET, Constitutional Law, 1547 2d Edition (1991)

<sup>100</sup> STONE, SEIDMAN, SUNSTEIN, AND TUSHNET, Constitutional Law, 1547 2d Edition (1991).

<sup>101</sup> *Id.* STONE, SEIDMAN, SUNSTEIN, AND TUSHNET, Constitutional Law, 1547 2d Edition (1991).

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488) Both clauses require the public as a whole, rather than distinct groups, to pay out funds to benefit people perceived to be in need of protection.

489) In the Mortgage foreclosure/Action to Quiet Title filed December 10, 2018 against Indigenous beneficiaries May E. McCloud and Vera L. Jones, the Complainant asserted

“In April 2011, defendants, both signed and submitted to Flagstar plaintiff’s assignor, an application for a mortgage loan to pay off an existing mortgage...”.<sup>102</sup>

490) The Complaint was factually flawed which is why the all matters of controversy must be tried before a Jury or if there is no genuine issue of a material fact, then Summary Judgement is granted.

491) Exhibit “CCC” identified as the “Uniform Residential Loan Application” page 1 of 4 includes:

- a. “May E. McCloud’s signature above the line “Borrower”.
- b. Co-Borrower signature line was left blank.
- c. Amount Existing Liens indicated “37,775”.
- d. Estate held in Fee Simple with May E. McCloud listed as “title will be held in what names”
- e. Under section “Borrower Information”
  - i. Borrower’s name is: May E. McCloud;
  - ii. Social Security Number: partially redacted;
  - iii. Home phone number: completely redacted;
  - iv. Date of Birth: 09/06/1934
  - v. Years of School: 14
  - vi. Present Address: 1361 S. 46<sup>th</sup> Street, Philadelphia, Pennsylvania 19143 with OWN BOX checked.
  - vii. Co-Borrower: Completely left blank.”<sup>103</sup>

492) Exhibit “CCC” identified as the “Uniform Residential Loan Application” page 2 of 4 includes:

- i. V. Monthly Income Section: Borrower: 1,441
- ii. Co-Borrower: No information
- iii. Assets and Liabilities: Liquidated assets: \$100,000 and total liabilities: \$39,548

493) Exhibit “CCC” identified as the “Uniform Residential Loan Application” page 3 of 4 includes:

- i. VI. Mortgage payments listed as: \$395

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<sup>102</sup> See, *Complaint Filed December 10, 2018* Quiet Title Complaint paragraph 3 Exhibit “CCC” attached thereto.

<sup>103</sup> *Id.*, at Exhibit “CCC” page 2 of 4 Uniform Residential Loan Application.

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- ii. VII. Details of Transaction Loan Amount: \$70,000
  - iii. VIII. Declarations: m(2) did you hold title to the home solely by yourself (s)
  - iv. VIX. Acknowledgement and Agreement:
    - 1. Borrower's Signature: May E. McCloud
    - 2. Co-Borrower's Signature: None.
  - b. The Deed at the time of the Mortgage Agreement was a Fee Simple Deed with both Ms. May E. McCloud and Vera L. Jones.
- 494) Respondents never had a valid acceptance or mutuality of assent from Ms. Vera L. Jones and Ms. May E. McCloud as the document *prima facially* reflects.
- 495) See December 10, 2018 Quiet Title Action.<sup>104</sup>
- 496) On February 27, 2017 Flagstar Bank forwarded correspondence to Ms. Price with attachments.<sup>105</sup>
- i. Continental Mutual Insurance Company Home Owner's Insurance: \$110/month.<sup>106</sup>
  - ii. Mortgage with forged initials and
  - iii. Mortgage page 13 of 13 notarized "personally appeared" name written MAY E. MCCLOUD and copy pasted Vera L. Jones signature line outside of margins.
  - iv. Note with MMC initials on every page
  - v. Note page 3 of 3 signature of May E. McCloud.
  - vi. Note contained no initials or signature of Vera L. Jones (forged/unforged).
  - vii. Copy of Annual Escrow Disclosure Statement and New Monthly Payment Amount as of: 12/01/2016: 524.51; and
  - viii. Customer Account Activity Statement showing monthly payments ranging from:
- 497) Respondents, the agents of the mortgage companies have failed to provide:
- a. Evidence of a valid Mortgage contract;
  - b. Evidence of Mutuality of assent;
  - c. Evidence of consideration received;
  - d. Evidence of a valid acceptance.

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<sup>104</sup> See, Exhibit "CCC".

<sup>105</sup> See, See, Exhibit "LL".

<sup>106</sup> See, See, Exhibit "LL".

- 507) Respondent agents of the government engaged in acts utilizing their governmental positions with the intent to discriminate, against a protected class of people, whom they were under an Oath, Duty to protect.
- 506) When States act in the marketplace, they resemble private businesses and should be free to exercise similar discretion to choose the parties with whom they deal.
- 505) The aforementioned paragraphs are incorporated as though fully referenced and set forth herein.

**CLAIM IV**  
**IMMUNITY FOR DISCRIMINATION DOES NOT APPLY WHEN**  
**GOVERNMENT IS A MARKET REGULATOR ENFORCING**  
**UNCONSTITUTIONAL POLICIES ON PROTECTED CLASS OF PEOPLE**

- 504) Paragraph 327 provides exhibits (although non-exhaustive) evidences the malfeasance acts engaged by Respondents and the contract interferences and unlawful takings of property.
- 503) Paragraphs 308 to 326 summarizes the laws and violations of those acts committed by Respondents against Petitioners.
- 502) See, Exhibits "H", "I", "J", "K", "L", "M", "N", "O", "P", "Q", "R", "U", "V", "W", "X", "Y", "Z", "AA", "CC", "DD", "EE", "FF", "GG", "JJ", "KK", "NN", "OO", "PP", "NN", "OO", "PP", "BB", "BB", "AA", "AA", "ZZ", "YY", "WW", "XX", "YY", "ZZ", "AA", "AA", "BB", "BB", "CC", "DD", "EE", "FF", "GG", "JJ", "KK", "NN", "NN", "OO", "OO", "PP", "PP", "QQ", "RR", "RR", "SS", "UU", "VV", "VV", "XX", "XX", "YY", "YY".
- 501) All government agent Respondents have partially sided and favor with the banks, foreclosures third-parties, attorneys cooperating to advance the scheme and agencies posing as valid government agencies to investigate and assist homeowners who may fall victim to predatory lending or fraudulent mortgage lending schemes.
- 500) All government agent Respondents are not parties to the contract, however, when issues arose regarding the alleged contracts, Respondents acted with the intent to prevent Petitioners from doing their due diligence and operating in good faith to obtain the necessary information to investigate the allegations asserted.
- 499) All government agent Respondents are not parties to the contract, however, have inserted and interfered in the private Trusts and private Agreements validly entered by Petitioners.
- 498) Respondents have misrepresented themselves and the original party to the contract (mutuality of assent) have not been the party with standing to assert the claims.

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- 508) Respondents acting in self-dealing through their State agency capacity, presented themselves as market participants, mortgage brokers, real-estate agents, mortgage lenders, bankers, councilors of law, shirking government laws, and co-mingling the governmental position with individual opportunities to exploit and profit through embezzling funds from the Federal Government by stealing homes from a federally protected class of people.
- 509) Respondents acts involved them discriminatorily denying access to court; obstructing the ability to timely respond to suits brought by participants in the foreclosure scheme; arbitrarily denying Petitioners' Motions and refusing Petitioners right to conduct Discovery while choosing to permit Respondent attorneys to engage in tactics to push through their claims for profit, urging "Plaintiff is entitled to move forward with their case".<sup>107</sup>
- 510) See Exhibits: "UU" "WW" "XX" "ZZ" "AAA" "BBB" and "CCC".

**CLAIM V**  
**UNCONSTITUTIONAL LEGAL SYSTEM OF**  
**SEGREGATION & DISCRIMINATION FAVORING WHITE SUPREMACY**

- 511) The aforementioned paragraphs are incorporated as though fully referenced and set-forth herein.
- 512) Respondent government agents/agencies engaged in acts with the intent to obstruct, defraud and cause severe and extreme emotional distress through policy enforced laws targeting Indigenous people.
- 513) Respondent government agents/agencies engaged in acts with the intent to instill operation "warp speed" and gentrify neighborhoods where Universities reached an agreement with Council members for them to land grab and uproot and displace all indigenous people within certain neighbors for the benefit of Gentrification (moving 'whites' into predominantly Indigenous neighborhoods) and profit.
- 514) Respondent government agents/agencies created discriminatory policies with government funding with a plan and scheme to remove all Indigenous and re-enact the Trail of Tears to upset, confuse, destroy and "revitalize" cities to make them more "white people" appealing.
- 515) At all times, Respondent government agents/agencies created discriminatory policies with government funding with a plan and scheme to remove all Indigenous

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<sup>107</sup> Statement at Discovery Hearing in Philadelphia Court of Common Pleas where Attorney Representatives for Matrix Financial were displeased with Discovery Responses of Defendants, however, had arrogantly refused to and failed to respond to Defendants Interrogatories and Request for Production of Documents.



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- 525) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 526) Colonialism and the law of the colonizer imposed life-altering trauma on Indigenous Peoples.
- 527) Colonialism and the Laws of the colonizer means invasion, appropriation of Indigenous Land and Resources, Unfair Laws, Destruction of Indigenous Habitats, Destruction of Indigenous Culture.
- 528) Colonialism and the Laws of the colonizer meant Genocide and Ethnocide.<sup>108</sup>
- 529) Colonization of America was unequivocally accompanied by widespread acts of Genocide and ethnocide that figure prominently in the astounding Indigenous population collapse since 1492.<sup>109</sup>
- 530) During the conquest phase, circ. Approximately 1492-1550 the number of deaths comprise the world's largest holocaust.
- 531) Many of the continued killings and disappearance of Indigenous in South America continue in parts of the United States to the present.
- 532) The threats of violence and extinction concern and stalk the tribes to this very day.
- 533) Indigenous Peoples daily lives never allow them peace of mind like that of the white colonizers occupying the land.
- 534) To this day, they continue to hide their true status for fear of retaliation and targeting and call themselves, Negro, Black, Colored and African-American to assimilate into American society.
- 535) Colonization was and remains lawful in the united states.
- 536) Colonial laws continue to remain valid and organize and enable the function of the colonial government to the disadvantage of Indigenous.
- 537) The very fabric of the foundation of the united states was built on colonization and continues to operate as such.

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<sup>108</sup> From 1474-1566 the Spanish killed, tortured, and terrorized destroying each Native cavillation they encountered. The depopulation of the Americas during this period was reduced by approximately 12 million Indigenous Peoples.

<sup>109</sup> *Id.*



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- 538) Colonization, through the courts of the colonizer and laws established to this very day, legaliz(ed) several elements of genocide which became a part of the fabric of the policies and systems established in the United States.
- 539) Men in black robes, through the creation of case law, created and continue to create a legal climate that enabled/enables the lawful commission of genocidal acts committed against Indigenous Peoples.
- 540) Genocide is defined by the United Nations in Article 2 of the Convention on the Prevention and Punishment of the Crime of Genocide (1948) as:
- a. ...”any of the following acts committed with intent to destroy, in whole or part, a national, ethnical, racial or religious group as such:
    - i. Killing members of the group;
    - ii. Causing serious bodily or mental harm to members of the group;
    - iii. Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or part;
    - iv. Imposing measures intended to prevent births within the groups;
    - v. Forcibly transferring children of the group to another group.”
- 541) To be genocidal, an act must be committed by:
- a. States,
  - b. Agencies,
  - c. Companies,
  - d. Individuals with the intent to destroy a group in whole or part.
- 542) Conditions of life are interpreted as:
- i. “Prevention from practicing their traditional customs;
  - ii. Forced resettlements;
  - iii. Denial of access to food relief, health, assurance, and development funds, and
  - iv. Destruction of the habitats utilized by Indigenous peoples.”
- 543) Forms of Genocide include:
- i. Utilitarian Genocide (mass killings to control economic resources),
  - ii. Retributive Genocide (to punish a group)
  - iii. Cultural Genocide or Ethnocide (destroying a culture to assimilate a group)
  - iv. Latent Genocide (intentional activities with unintended consequences, such as spreading germs during an invasion), and

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- v. Developmental Genocide (when perpetrators intentionally or unintentionally harm victims as a result of colonization or economic exploitation).

544) In every instance of genocide, the motives are varied, but ignited by **racism**:

- i. To eliminate competitors or potential threats,
- ii. To acquire wealth,
- iii. To implement a belief, theory, or ideology, and
- iv. To create terror.

545) The Convention was unanimously adopted by the United Nations in 1948, however, was not ratified by the United States until 1988.

546) In the 20<sup>th</sup> century, **genocide** and **ethnocide** rose substantially and a substantial number of Indigenous Peoples were victimized, displaced, replaced and murdered as a result.

547) Colonial legislation, colonial laws, and colonial policies, at the federal and state level have been created in violation of the Constitution and International Human Rights Laws and false truths were deliberately created and propagandized to justify the enforcement of such laws to the continued violation of rights for the advancement of colonial white supremacy civilization.

548) Petitioners on numerous occasions have suffered the above acts through the specific actions and acts committed collectively by Respondents.

549) *See*, **Exhibits “B-YYY”** in total.

**CLAIM IX**  
**GENERAL HUMAN RIGHTS VIOLATIONS**

550) The aforementioned paragraphs are incorporated as though fully set-forth herein.

551) The Universal Declaration of Human Rights of 1948 provides that everyone has the right to life, liberty, and the security of person.

552) Article 7 provides: “all are equal before the law and are entitled without any discrimination to equal protection of the law...”

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- 553) Respondents acted with the intent to obstruct equal access to the law and to be the protections of the law through use of discriminatory tactics by identifying those whom they would victimize based upon:
- i. Indigenous status;
  - ii. Indigenous lands and
  - iii. Age of Indigenous.
- 554) Respondents Agreements entered between the State, Cities, Municipalities with Mortgage Companies were similarly to the “Kids for Cash” scheme; The targets in this scheme are Indigenous populous with homes that are paid for in geographical areas government agents and officials have identified as profit generating.
- 555) Respondents have acted with the intent to target and dispossess Indigenous populous because the “Age of Discovery” which afforded them the authority to mistreat, abuse, and kill Indigenous at will was abolished.
- 556) Respondents have acted with the intent to target and dispossess Indigenous populous because the 400 years of slavery in 2019 ended.
- 557) *See, Exhibits “A” “B” “S” “DDD” and “YYY”.*

**CLAIM X**  
**VIOLATION OF DIGNITY RIGHTS**

- 558) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 559) *See, Exhibits “D” “E” “F” “G” “H” “J” “K” “L” “M” “N” “O” “P” “Q” “R” “V” “W” “X” “GG” “II” “JJ” “KK” “NN” “OO” “PP” “RR” “SS” “TT” “UU” “VV” “WW” “XX” “YY” “ZZ” “AAA” “BBB” “CCC” “DDD” “FFF” “HHH” “III” “JJJ” “KKK” “LLL” “MMM” “NNN” “OOO” “PPP” “QQQ” “RRR” “ TTT” “UUU” “VVV” “YYY.”*

**CLAIM XI**  
**VIOLATION OF FREE, PRIOR AND INFORMED CONSENT**

- 560) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 561) *See, Exhibit “EEE”.*

**CLAIM XII**  
**TORTURE**

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562) The aforementioned paragraphs are incorporated as though fully set-forth herein.

563) **See Exhibit “Q” and allative supporting attachments** which encompasses statements of a party opponent.

**CLAIM XIII**  
**CRIMES AGAINST HUMANITY**

564) The aforementioned paragraphs are incorporated as though fully set-forth herein.

565) Crimes against Humanity include attacks directed against any civilian population means a course of conduct involving the multiple commission of acts referred the definition section, against any civilian population, pursuant to or in furtherance of a State or organizational policy to commit such attack.

566) Crimes against Humanity namely murder, extermination, enslavement, deportation, and other inhumane acts before or during a war, or persecution on political, racial or religious grounds in execution thereof.

567) Article 7 of the Rome Statute does not have to be linked to an armed conflict and can also occur in peacetime, similar to the crime of genocide.

568) Crimes against Humanity physical elements include the commission of “any of the following acts”:

- a. Murder;
- b. Extermination;
- c. Enslavement;
- d. Deportation or forcible transfer of population;
- e. Imprisonment;
- f. Torture;
- g. Grave forms of sexual violence;
- h. Persecution;
- i. Enforced disappearance of persons;
- j. The crime of apartheid;
- k. Other inhumane acts.

569) Crimes of *contextual element* occur “when committed as part of a widespread or systematic attack directed against any civilian population”.

570) Crimes of a *mental element* include “knowledge of the attack”

571) The contextual element determines that crimes against humanity involve either large-scale violence in relation to the number of victims or its extension over a broad

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geographic area (widespread), or a methodical type of violence (systematic). This excludes random, accidental or isolated events.

- 572) The sanctioned legal police killings of Indigenous people labeled as “black” is *prima facie* evidence of widespread crimes against Humanity occurring against a particular group of people.
- 573) *See, Attachments and Exhibits “A” through Exhibit “YYY”*, which are not exhaustive of the overwhelming National evidence of the sanctioned human rights violations occurring on American soil.

**CLAIM XIV**  
**VIOLATION OF THE CONVENTION ON THE ELIMINATION OF**  
**ALL FORMS OF RACIAL DISCRIMINATION**

- 574) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 575) Under the Convention, ‘racial discrimination’ means any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life.
- 576) Respondents, collectively, in their individual capacities and through using their official positions, have acted solely with the intent to deny Petitioners their fundamental and basic human rights based solely on the fact that they are not a part of the “white” race.
- 577) Respondents, have collectively, exhibited through:
- ii. Denying access to courts;
  - iii. Dismissing valid claims asserting economic and social injustice and harm;
  - iv. Utilizing operation “warp-speed” processes to eliminate “discovery” process and the ability to uncover the truth to substantiate claims of fraud and theft against mortgage companies and attorneys;
  - v. Utilizing arbitrary and capricious actions/methods to dismiss claims and fail to provide reasoning or opinions regarding such dismissals.
  - vi. Refusing to permit access to electronic filing system, placing additional burdens, frustrations and hindrances upon the protected class;
  - vii. Deliberate denial of constitutional due process to enjoy and exercise on an equal footing the rights to property and individual fundamental rights afforded and protecting the liberties and justice of all;

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- viii. Ignoring complaints and denying Indigenous Officials the opportunity to investigate, inquire and assert rights entitled to the tribe and tribal family members.
  - ix. Deliberately ignoring the Trustees duty and responsibility to the tribal family beneficiaries.
  - x. Misleading Petitioners by providing with false information;
  - xi. Circumventing the procedural legal process by avoiding proper service, proper notice, and acting as if the written laws do not apply to them.
  - xii. Failing to justly consider the facts and information presented to support the rights and entitlements of Plaintiffs through their indigenous status.
  - xiii. Filing motions to not be required to communicate with relevant and necessary parties to the claim.
  - xiv. Refusing to communicate with parties after filing suit against the party.
  - xv. Denying equal protection and equal footing to the protections of the law.
- 578) Respondents, engaged in a number of questionable real estate transactions involving mortgages that specifically targeted the Indigenous.
- 579) When Indigenous Juris Consul acting under official authority of Guale Yamassee intervened, Respondents filed Motions to not communicate with her.
- 580) As a part of the Indigenous properties for Cash Scheme, Judges and the entire legal system in Pennsylvania, Massachusetts, New Jersey, and Virginia assisted in facilitating the unlawful claims and actions to either
- i. Extort FIAT from Indigenous, or
  - ii. Dispossess the Indigenous from their res.
- 581) At no time did any of the attorneys or conspiring agents, consider that any Indigenous would:
- i. Respond and object to the Racket;
  - ii. Timely respond (voluntarily or involuntarily)
  - iii. Understand what was happening;
  - iv. Understand the legal process;
  - v. Be able to afford counsel who is a part of the Racket; or
  - vi. Would challenge the system.
- 582) Respondents as a result of getting away with abusing Indigenous residing in the original Colonies for decades, were determined to continue in utilizing the same scheme and ponzi plan to obtain profit through dispossessing Indigenous of lands and property they held legal title despite the international orders for them to cease such acts.

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- 583) Respondents, being duly trained and educated in law, politics, economics, business and other highly impressionable professions used their knowledge, skills and expertise to advance discriminatory practices against the Indigenous population.
- 584) Respondents, were careful who they selected in Philadelphia, with a substantially large poverty-stricken population, their plan to reduce poverty through “operation warp speed” included:
- i) City Counsel abusing imminent domain rights and authorizing and condemning homes that many Indigenous have inherited and therefore owned.
  - ii) Gentrifying the heavily indigenous populated areas with “whites” and forcing Indigenous out through land grabs, fraudulent foreclosures and unlawful evictions obtained through abusing the legal process.
  - iii) Setting up a profiting scheme that involved whites purchasing property in EVICTED Indigenous neighbors at substantially reduced costs.
  - iv) Reaping a warp speed profit that would economically destroy Indigenous People to the advantage of the “whites” replacing them.
- 585) Respondents through abuse individually and through using their positions, have acted solely with the intent to deny Petitioners their fundamental and basic human rights based solely on the fact that they are not a part of the “white” race.
- 586) Respondents in abusing their authority and power have targeted Petitioners as a result of their Indigenous, racial, creed, ethnic and/or cultural affiliation, background, and/or geography.
- 587) Respondents’ stole the homes of Petitioners, Indigenous and continued to use forceful life threatening tactics of dispossess lands as the colonial settlers.
- 588) Respondents through their policies, created and enforced forced migration and removal of Petitioners’ ancestors from their original ancestral lands.
- 589) Petitioners have resided in the northern eastern parts of North America. Since the forced removal and Trail of Tears.
- 590) Respondents, collectively operating to further develop properties and lands for “whites” have devised a scheme to remove Indigenous Peoples once again from their homes and continue the forced division of families, destruction of cultures, and forced poverty through implementation of the **doctrine of superiority**.



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591) Respondents, Trustees, through its status as governmental officials operating within the functions of their official Indigenous status have been dismissed as:

- xvi. Human beings,
- xvii. Being worthy of being heard
- xviii. Being able to reproach those claiming title to their lands.

592) *See, Exhibits “A” through Exhibit “YYY”, which are not exhaustive.*

**CLAIM XVI**  
**VIOLATION OF CUSTOMARY INTERNATIONAL LAW**

593) The aforementioned paragraphs are incorporated as though fully set-forth herein.

594) *See, Attachments Supporting Documents and Exhibits “UUU” “XXX’ and “YYY”.*

**CLAIM XVII**  
**VIOATION OF JUS COGENS**

595) The aforementioned paragraphs are incorporated as though fully set-forth herein.

596) *See, Exhibits “UUU” “XXX’ and “YYY”.*

**CLAIM XVIII**  
**BREACH OF FIDUCIARY DUTY OF DOCTRINE OF TRUST**

597) The aforementioned paragraphs are incorporated as though fully set-forth herein.

598) The ‘trust responsibility’ is a legal principle that the Supreme Court noted in United States v. Mitchell (1983) is “the undisputed existence of a general trust relationship between the United States and the [Indigenous] people.”

599) This relationship is one of the most significant and motivating concepts in federal Indian law.

600) Between 1787 and 1871, the U.S. entered into nearly four hundred treaties with [Indigenous] tribes. Generally, in these treaties, the U.S. obtained the land it wanted from the tribes, and in return, the U.S. set aside other reservation lands for those tribes and guaranteed that the federal government would respect the sovereignty of the tribes, would protect the tribes, and would provide for the well-being of the tribes.

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- 601) Respondents were informed and placed on Notice numerous times by Petitioners that Petitioners are Indigenous and that the Federal Government has jurisdiction over all matters concerning Indigenous Peoples.
- 602) Respondents goals were to dishonor and ignore any treaty assertions or obligations on part of Respondent Commonwealths' agents to adhere to the Constitution and Federal Laws concerning the Indigenous.
- 603) The Supreme Court has held that treaties created a special relationship between tribes and the federal government that obligates the government to keep its end of the bargain given that tribes have kept theirs. This principle, that the government has a duty to keep its word and fulfill its treaty commitments is known as the doctrine of trust responsibility.<sup>110</sup>
- 604) *See, Exhibits: "SSS" "UUU" "XXX" and "YYY".*

**CLAIM XIX**  
**CONSTITUTIONAL AMENDMENT I VIOLATION**  
**AND IMPEDIMENT TO RIGHT TO PETITION AND RESPOND TO BEING SUED**

- 605) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 606) Respondents at all times have acted in engaging and causing obstructionists tactics to the courts.
- 607) Respondents in every instance has caused harm and injury to Petitioners in their official and individual capacity.
- 608) *See, Exhibits "C" through "RRR".*

**CLAIM XX**  
**CONSTITUTIONAL AMENDMENT IV VIOLATION**  
**SEIZING OF PROPERTY UNDER FRAUDULENT MORTGAGE SCAMS**

- 609) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 610) Forced evictions and dispossessing Indigenous of their property violate international human rights law.

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<sup>110</sup> *See, Seminole Nation v. U.S.* (1942), and *U.S. v. Mason* (1973), and *Morton v Mancari* (1974).

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611) *See, Exhibits “C” through “RRR”.*

**CLAIM XXI**  
**CONSTITUTIONAL AMENDMENT V VIOLATION**  
**DENIAL OF DUE PROCESS & UNLAWFUL INTERFERENCE AND WRONGFUL**  
**TAKING OF PRIVATE INDIGENOUS PROPERTY**

612) The aforementioned paragraphs are incorporated as though fully set-forth herein.

613) *See, Exhibits “C” through “RRR”.*

**CLAIM XXII**  
**CONSTITUTIONAL AMENDMENT VI VIOLATION**  
**OF RIGHT TO CONFRONT ACCUSERS AND TO COUNSEL**

614) The aforementioned paragraphs are incorporated as though fully set-forth herein.

615) *See, Exhibits “A” through “YYY”.*

**CLAIM XXIII**  
**CONSTITUTIONAL AMENDMENT VII VIOLATION**

616) The aforementioned paragraphs are incorporated as though fully set-forth herein.

617) *See, Exhibits “A” through “YYY”.*

**CLAIM XXIV**  
**CONSTITUTIONAL AMENDMENT VIII VIOLATION**

618) The aforementioned paragraphs are incorporated as though fully set-forth herein.

619) *See, Exhibits “B” through “YYY”.*

**CLAIM XXV**  
**CONSTITUTIONAL AMENDMENT IX VIOLATION**

620) The aforementioned paragraphs are incorporated as though fully set-forth herein.

621) *See, Exhibits “B” through “YYY”.*

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**CLAIM XXVI**  
**CONSTITUTIONAL AMENDMENT X VIOLATION**  
**OF FUNDAMENTAL NATIONAL AND INTERNATIONAL LAW RIGHTS**

622) The aforementioned paragraphs are incorporated as though fully set-forth herein.

623) *See, Exhibits "B" through "YYY".*

**CLAIM XXVII**  
**CONSTITUTIONAL AMENDMENT XI VIOLATION**  
**OF ABOLITION OF SLAVERY & TREATMENT AS PEONS**

624) The aforementioned paragraphs are incorporated as though fully set-forth herein.

625) *See, Exhibits "B" through "YYY".*

**CLAIM XXVIII**  
**CONSTITUTIONAL AMENDMENT VXII VIOLATION**  
**OF EQUAL PROTECTIONS & DUE PROCESS CLAUSE**

626) The aforementioned paragraphs are incorporated as though fully set-forth herein.

627) *See, Exhibits "B" through "YYY".*

**CLAIM XXIX**  
**CONSTITUTIONAL AMENDMENT XIII VIOLATION**  
**PREDATORY LENDING , TARGETING OF SENIORS AND RACIALLY PROTECTED**  
**MINORITIES IN NATIONAL FORECLOSURE SCAM**

628) The aforementioned paragraphs are incorporated as though fully set-forth herein.

629) Predatory lending is not limited to one class of borrowers. Signs of predatory lending include the lack of a fair exchange of value or loan pricing that reaches beyond the risk that a borrower represents or other customary standards.

630) "[P]redatory lending involves at least one, and perhaps all three, of the following elements:

- a. Making unaffordable loans based on the assets of the borrower rather than on the borrower's ability to repay an obligation;
- b. Inducing a borrower to refinance a loan repeatedly in order to charge high points and fees each time the loan is refinanced ("loan flipping"); or

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- c. Engaging in fraud or deception to conceal the true nature of the loan obligation, or ancillary products, from an unsuspecting or unsophisticated borrower."
- 631) Respondents have intentionally targeted a protected class knowing their procedural and process methods were fraudulent.
- 632) *See, Exhibits "B" through "YYY".*

**CLAIM XXX**  
**VIOLATION OF CONSTITUTIONAL IMPLIED FUNDAMENTAL RIGHTS & PRIVILEGES AND IMMUNITY CLAUSE**

- 633) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 634) The fundamental rights applicable include:
  - a. The right to worship Elohiym
  - b. The right to family and be a parent
  - c. The right to privacy
  - d. The right to personhood and to be free from bodily restraint
  - e. The right to liberty
  - f. The right to contract and make a living
  - g. The right to marry and establish a home
- 635) The Privileges and Immunities Clause of **Article IV, Section 2** of the Constitution states that "the citizens of each state shall be entitled to all privileges and immunities of citizens in the several states." This clause protects fundamental rights of individual citizens and restrains state efforts to discriminate against out-of-state citizens.
- 636) Respondents actions have been at all times to intentionally violate Petitioners' Privileges and Immunity Rights.
- 637) Respondents actions have been at all times to intentionally obstruct Petitioners' implied fundamental rights to the demise and detriment of Petitioners' very existence and being.
- 638) *See, Exhibits (A-ZZZ)*

**CLAIM XXXI**  
**MORTGAGE LICENSING ACT VIOLATION**

- 639) The aforementioned paragraphs are incorporated as though fully set-forth herein.

651) Malfeasance comprehensively presented is wrongful conduct that affects, interrupts or interferes with the performance of official duties.

650) Malfeasance is an affirmative act that is illegal or wrongful.

649) The aforementioned paragraphs are incorporated as though fully set-forth herein.

**CLAIM XXXV**  
**MALFEASANCE**

648) See, Exhibits "C" "F" "H" "R" "HH" "JJJ" "LLL" "MMM" "NNN" "VVV".

647) The aforementioned paragraphs are incorporated as though fully set-forth herein.

**CLAIM XXXIV**  
**FEDERAL HOME LOAN BANK ACT VIOLATION**

646) See, Exhibits "C" "F" "H" "R" "HH" "JJJ" "LLL" "MMM" "NNN" "VVV".

645) The aforementioned paragraphs are incorporated as though fully set-forth herein.

**CLAIM XXXIII**  
**TRUTH IN LENDING ACT VIOLATION**

644) See, Exhibits "B" through "VY".

643) The aforementioned paragraphs are incorporated as though fully set-forth herein.

**CLAIM XXXII**  
**CONSUMER CREDIT PROTECTION ACT VIOLATION**

642) See, Exhibits "C" "F" "H" "R" "HH" "JJJ" "LLL" "MMM" "NNN" "VVV".

641) The aforementioned paragraphs are incorporated as though fully set-forth herein.

**CLAIM XXXI**  
**MONEY TRANSMITTER ACT VIOLATION**

640) See, Exhibits "C" "F" "R" "HH" and "LLL".

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

- 652) Malfeasance is an act for which there is no authority or warrant of law or which a person ought not to do at all or the unjust performance of some act which party performing it has no right or has contracted not to do at all.
- 653) Respondents affirmative acts committed while in their official capacities ( clerks, lawyers, judges, mortgage lenders, mortgage brokers, land developers, sheriffs, council members, *et cetera*) against Petitioners interrupted the performance of Respondents performing their duties with fidelity.
- 654) Respondents acts of targeting a particular group and initiating fraudulent foreclosure suits and dispossessing Petitioners of property was against or not authorized by law.
- 655) *See, Exhibits “B” through “YYY”.*

**CLAIM XXXVI**  
**DEFAMATION**

- 656) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 657) Defamation is the holding up of a person to ridicule scorn or contempt in a respectable and considerable part of the community.
- 658) The arena of the court has historically been considered a respectable and considerable part of the community.
- 659) Defamation appears in two forms libel or slander.
- 660) Defamation is that which tends to injure reputation to diminish the esteem, respect, goodwill, or confidence in which the plaintiff is held or to excite adverse, derogatory or unpleasant feelings or opinions against the target of the libel or slander.
- 661) Respondents acted with the intent to place Petitioners in an unfavorable esteem..
- 662) Respondents acted with the intent to cause and excite adverse and unpleasant feelings against Petitioners through defamation through libel through:
  - 1. Filing false mortgage foreclosure proceedings against Petitioners; and
  - 2. Communicating false information to the Courts, and



IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

3. Causing the communications through writings to be reported to credit agencies and
  4. Causing written communications to be utilized through the United States Postal Service, mailing:
    - a. Notices,
    - b. Lawsuit Complaints,
    - c. Correspondence,
    - d. Bills,
    - e. Collection letters, et cetera and
  5. As it is intended to be understood led to be understood and causing the harm it was intended.
- 663) Respondents intended to defame Petitioners to destroy the reputation of Petitioners and place Petitioners in a false light.
- 664) *See, Exhibits "B" through "YYY"* whereas all exhibits and additional documents of public record regarding the acts of fraudulent claims have been published in the public domain and have tarnished the reputation of Petitioners.

**CLAIM XXXVII**  
**ABUSE OF PROCESS**

- 665) The aforementioned paragraphs are incorporated as though fully set-forth herein.
- 666) Respondents are engaged in an operation to make money illegitimately that is ongoing and continuous.
- 667) Respondents in all levels of positions within the judicial, legal and real-estate industries operated their illegal enterprise through use of the legal process to extort and injure anyone who refused to acquiesce and "just make payments" through their legally constructed scheme.
- 668) Respondents used the legal process to accomplish all of their unlawful actions by using presumptively lawful means, such as causing a summons, writ, warrant, mandate, order or any other process to issue from issuing a court order to accomplish a purpose not intended by law.
- 669) *See, Exhibits "B" through "YYY"*

**CLAIM XXXVIII**  
**WIRE FRAUD**

- 670) The foregoing paragraphs are incorporated by reference as if set forth fully herein.
- 671) The elements of wire fraud are:

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- a. defendant created or participated in a scheme to defraud another out of money or property.
  - b. The defendant did so with intent to defraud.
  - c. It was reasonably foreseeable that the defendant would use wire communications; and
  - d. The defendant did in fact use interstate wire communications.
- 672) Respondents Flagstar phoned May E. McCloud day and night.
- 673) Beneficiary May E. McCloud, suffering from dementia would answer the phone and the phone calls caused her severe distress and anxiety exacerbating her dementia condition.
- 674) Prior to being informed that Vera L. Jones was a joint owner in Fee of 1361 S. 46<sup>th</sup> Street, Vera L. Jones contacted Flagstar and informed them to cease calling her mother.
- 675) Flagstar continued to call and demand that payments continue
- 676) Rhashea Lynn Harmon'El contacted Flagstar and informed them to cease calling. Flagstar ignored the request and continued calling at all time of the night and day.
- 677) The mortgage with May E. McCloud was/is a fraud created by the owners of Flagstar and Matrix Financial and other participant Respondents herein who established a scheme to defraud Petitioners out of money and/or property.
- 678) Respondents targeted Petitioners with the specific intent to defraud for the purpose of extorting money or stealing property to then sell for money.
- 679) It was reasonably foreseeable that Respondents would use wire communications to contact and harass Petitioners once the payments ceased.
- 680) Respondents did in fact use interstate wire communications to advance their scheme which furthered the terroristic method used to defraud Petitioners.

**CONCLUSION**

- 681) The foregoing paragraphs are incorporated by reference as if set forth fully herein.
- 682) Respondents actions at all times have violated Torah; the Law of Yahuah.
- 683) Respondents at all times have failed to proffer any factual and legal evidence through pleadings or attaching material documents as evidence to their Mortgage Complaints and establish any cognizable and honorable basis for their foreclosures and therefore any remedy to be provided at Common Law, International Law, or by Statutory Law

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

is beyond Respondents' reach and therefore the direct cause of Respondents need to engage in malfeasance.

684) Furthermore, Respondents are criminal opportunist and looking to take part in the housing mortgage foreclosure crisis that is currently occurring in the Nation, although not solely, and primarily against a marginalized and discriminated group of people, who are not only indigenous to these lands but who have been targeted for the sole purpose of advancing the Gentrification scheme.

685) Attorneys are not legally bonded to engage in debt collecting and have failed to adhere to the laws required by the Fair Credit Collections requirements to operate as lawful debt collectors of the united states.

686) Respondents tactics are direct violations of the Declaration on the Rights of Indigenous Peoples established under the United Nations for the protection of people who have been and continue to be detrimentally affected by colonialization and white supremacy.

687) Respondents tactics and intentional acts violate the Guale Yamassee Indigenous Constitution.

688) Respondents tactics and intentional acts violate Free Prior and Informed Consent by Indigenous people regarding their properties and land.

**WHEREFORE**, based upon the aforementioned and by Respondent's plethora of fraudulent claims and documents filed in the above matters, Complaints, Deed Transfers, Orders Denying access to Courts and Orders enforcing fraudulent trespasses to Indigenous Property, allative documents and evidence of acts committed serve *prima facie* as Admissions By a Party-Opponent of the violations asserted in this Claim.

**WHEREFORE**, Petitioners on behalf of their-beneficiaries requests this COURT to ORDER Respondents to cease their unlawful and fraudulent actions against Petitioners, that this

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Court under 18 U.S. Code § 3333 **ORDER** an investigation into the Mortgage fraudulent schemes engaged by the above affiliate States of the United States and Federal Government and local municipalities, and as a result of the intentional discriminatory practices and abuses of law and abuse of discretion that punitive damages for Respondents actions in the following nature be provided post haste:

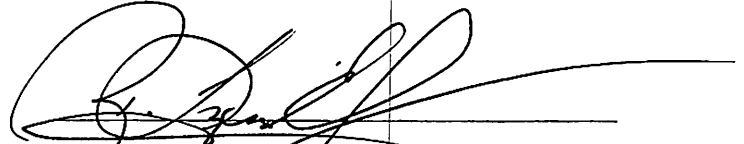
- 1) Court issue an INJUNCTION;
- 2) Xi Chin Clan Nation receive punitive compensation for all the time and injuries, physical, mental and distress impressed upon Petitioners and currencies expended to entertain Respondents fraudulent and colorable actions, in the amount of **\$599,000,000 (FIVE HUNDRED and NINTY NINE MILLION)**.in Silver and Gold Coins, to ensure Petitioners are reasonably compensated for the frivolous and scandalous fraudulent attempts to instill terror in Petitioners'-beneficiaries, and other family clans disparately impacted by the intentional acts, including but not limited to:
  - a. Defrauding an elderly with Dementia and
  - b. Attorneys fraudulently applying (forging) the signature of a beneficiary to mortgage documents upon realizing the initials and signature were missing, whose approval for a loan was never obtained,
  - c. Attorneys and courts intentionally ignoring the law and unconstitutionally knowingly and willfully engaging and presenting false and fraudulent information before the Tribunal with knowledge of the material falsity of the facts presented,
  - d. Attorneys engaging in unlawful acts of mail fraud by placing fraudulent documents through use of paper terrorism, through the united states federal mail system to advance and further their planned schemes and intentional unlawful acts, devised to defraud and dispossess solely to gain profit.
  - e. Judges, knowing and possessing knowledge of laws Judicially Noticed, in international law and under the Constitution and laws of the united states, accepting such conveyance of paper terrorism and unconstitutionally **ORDERING** and fraudulently providing rights to the conspirators to dispossess Indigenious of real property *res*,

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

- 3) An investigation into the corrupt practices of the trespass and stealing real property and personal property, through *de jure* fraudulent foreclosure actions to provide developers and colonial “white” citizens with opportunities to purchase property at substantially reduced, less than Fair Market Values, and is conducted and prosecuted to the fullest extent of Torah which is law from which all law is derived, and the Constitutional Laws of the United States and not under *de jure* or *de facto* color of law or abuses of discretion, and
- 4) All Petitioners be made whole through compensatory compensation with interest for all intentional trespasses and acts committed by Respondents in their official and individual capacity and permitted by their superiors and authorities that resulted in harm and/or to Petitioners.

Honorably Submitted,  
All Rights Reserved

Date of Execution: 12.24.2020



*Autograph of Rhashea Lynn Harmon-El, Esq.  
Trustee  
The Be Kind and Unified Indigenous Foreign  
Private Family Trust (Trustee)  
Harmon Rhashea Lynn Foreign Trust  
(Trustee)  
RLH Ma'at Law Firm (CEO)  
Chief Juris Consul Officer of Guale Yamassee  
Juris Consul Office  
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267.312.7322  
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1.888.696.0367*



*Autograph of Chief White Owl, Trustee*

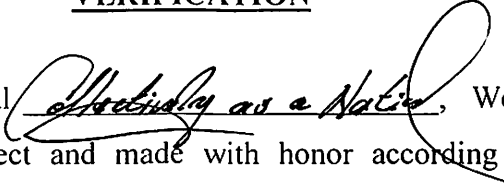
IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

*Xi Chin Clan Nation (Trustee)*  
*Chief Compliance Office of Guale Yamassee*  
*Compliance Department*  
*P.O. Box 6666*  
*Woodbridge, Virginia 22195*  
*703.967.5994*  
*Compenforcer@gualevamasseeecourt.org*  
*1.888.696.0367*

*-All Rights Reserved-*

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

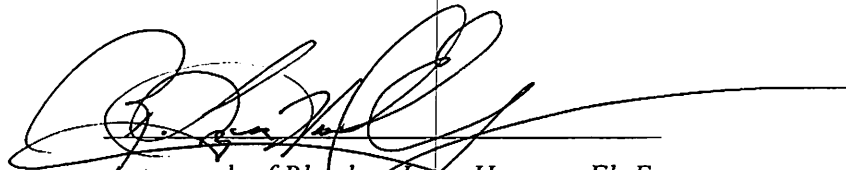
VERIFICATION

By our autographed hand and seal  Wee verify that the factual statements herein are true, correct and made with honor according to our knowledge and comprehension.

As the Trustees and Juris Consul of Guale Yamassee, Wee, verify in accordance with the **laws, statutes and commandments of Yahuah**, our **Elohiym of Yashar'el**, as is our right per the First Amendment of the Constitution and **in accordance with the laws of Jus Cogens and UCC**, which are in accordance with the Laws, Statutes, and Commandments of Torah, that the statements made herein are made with the utmost knowledge and intent to represent **TRUTH** and that it is comprehended that having intentionally and knowingly being made of a corrupt mind with the intent to commit wicked, deceitful perjuries, that such acts, exercise the understanding of the established parallel law of Torah codified in 28 United States Code §1746 relating to unsworn falsification.

Honorably Submitted,  
All Rights Reserved

Date of Execution: 12.24.2020



Autograph of Rhashed Lynn Harmon-El, Esq.  
The Be Kind and Unified Indigenous Foreign  
Private Family Trust (Trustee)  
Harmon Rhashea Lynn Foreign Trust  
(Trustee)  
RLH Ma'at Law Firm (CEO)  
Chief Juris Consul Officer of Guale Yamassee  
Juris Consul Office Court



Autograph of Chief White Owl  
Xi Chin Clan Nation (Trustee)  
Chief Compliance Office of Guale Yamassee  
Compliance Department

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

**CERTIFICATE OF SERVICE**

By my autograph and seal, and in conformance with the Uniform Postal Act and laws governing by the Uniform Postal Union, for submitting mail through the Post Office, Wee, \_\_\_\_\_, and \_\_\_\_\_ have certified that Wee, have caused a true and correct copy of the CIVIL ACTION against the **RESPONDENTS** agents of the United States and the United States as a Dominion of the British Empire and its agents to be filed on \_\_\_\_\_ and mailed by the U.S. Postal First Class Mail on \_\_\_\_\_ to the following persons (entities) or living men or women:

QUEEN ELIZABETH  
d/b/a SOVEREIGN of ENGLAND and Individually  
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London, SW1A 1AA

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100 South Street  
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1111 E. Main St., Suite 700,  
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NEW JERSEY STATE BAR ASSOCIATION  
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New Brunswick, New Jersey [08901]

MASSACHUSETTS BAR ASSOCIATION  
20 West Street  
Boston, Massachusetts [02111-1204]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

THE SUPREME COURT OF PENNSYLVANIA  
EASTERN DISTRICT  
468 City Hall  
Philadelphia, Pennsylvania [19107]

LISETTE SHIRDAN-HARRIS  
d/b/a JUDGE and AGENT of The Commonwealth  
of Pennsylvania  
Attorney Account ID# 61204 and Individually  
Court of Common Pleas  
692 City Hall  
Philadelphia, Pennsylvania [19107]

CAMILLE T. BARRY, d/b/a NOTARY and BEEREN & BARRY  
INVESTMENTS, LLC, and Individually  
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Reston, Virginia [20190]

BRANCH BANKING AND TRUST CORPORATION (NYSE:BB&T)  
200 West Second Street  
Winston Salem, North Carolina [27101]

COMMONWEALTH OF VIRGINIA  
Ralph Northam,  
d/b/a GOVERNOR OF VIRGINIA and Individually  
c/o OFFICE OF THE SECRETARY OF THE COMMONWEALTH  
SERVICE OF PROCESS DEPARTMENT  
P.O. BOX 2452  
Richmond, Virginia [23218-2452]

SECRETARY OF THE COMMONWEALTH OF VIRGINIA  
P.O. Box 1795  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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PENNSYLVANIA OFFICE OF ATTORNEY GENERAL  
Josh Shapiro, d/b/a  
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COMMONWEALTH OF PENNSYLVANIA  
Tom Wolf  
d/b/a GOVERNOR OF PENNSYLVANIA and Individually  
Main Capital, Room 225  
Harrisburg, Pennsylvania Commonwealth, [17120]

COURT OF COMMON PLEAS PHILADELPHIA COUNTY  
AOPC  
1515 Market Street  
Philadelphia, Pennsylvania [19102]

PHILADELPHIA COUNTY, CITY OF PHILADELPHIA  
Jim F. Kenney  
d/b/a MAYOR OF THE CITY OF PHILADELPHIA and Individually  
City Hall, Room 115  
Philadelphia, Pennsylvania [19107]

DARRELL CLARK  
d/b/a CITY OF PHILADELPHIA COUNCIL  
PRESIDENT and Individually  
City Hall, Room 494  
Philadelphia, Pennsylvania [19107]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

E & E FINANCIAL, INC. D/B/A EDGE  
MORTGAGE SERVICES, and  
EUGENE BEDERMAN, Individually  
2337 Philmont Avenue, Suite 104A  
Huntingdon Valley, Pennsylvania [19006]

MARK SQUILLA  
d/b/a DEPUTY MAJORITY WHIP and Individually  
City Hall, Room 332  
Philadelphia, Pennsylvania [19107]

KENYATTA JOHNSON  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 580  
Philadelphia, Pennsylvania [19107]

JAMIE GAUTIER  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 586  
Philadelphia, Pennsylvania [19107]

CURTIS JONES JR.  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MAJORITY WHIP and Individually  
City Hall, Room 404  
Philadelphia, Pennsylvania [19107]

BOBBY HENON  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 484  
Philadelphia, Pennsylvania [19107]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

MARIA D. QUINONES SANCHEZ  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 508  
Philadelphia, Pennsylvania [19107]

CINDY BASS  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 312  
Philadelphia, Pennsylvania [19107]

CHERELLE PARKER  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 577/584  
Philadelphia, Pennsylvania [19107]

BRIAN J. O'NEILL  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER and Individually  
City Hall, Room 562  
Philadelphia, Pennsylvania [19107]

KENDRA BROOKS  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER AT LARGE and Individually  
City Hall, Room 408  
Philadelphia, Pennsylvania [19107]

ALLAN DOMB  
d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER AT LARGE and Individually  
City Hall, Room 316  
Philadelphia, Pennsylvania [19107]  
DEREK GREEN

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

d/b/a CITY OF PHILADELPHIA COUNCIL  
MEMBER AT LARGE and Individually  
City Hall, Room 594  
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KATHERINE GILMORE RICHARDSON  
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MEMBER AT LARGE and Individually  
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HELEN GYM  
d/b/a CITY OF PHILADELPHIA COUNCIL  
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MEMBER AT LARGE and Individually  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

HARRY J. PARRISH II  
d/b/a MAYOR AND CITY COUNCIL OF  
MANASSES VIRGINIA and Individually  
9027 Center Street  
Manassas, Virginia [20110]

PAMELA J. SABESKY  
d/b/a VICE MAYOR OF MANASSAS and Individually  
9027 Center Street  
Manassas, Virginia [20110]

MICHELLE DAVIS-YOUNGER  
d/b/a CITY COUNCIL MEMBER and Individually  
9027 Center Street  
Manassas, Virginia [20110]

THERESA COATES-ELLIS  
d/b/a CITY COUNCIL MEMBER and Individually  
9027 Center Street  
Manassas, Virginia [20110]

IAN LOVEJOY  
d/b/a CITY COUNCIL MEMBER and Individually  
9027 Center Street  
Manassas, Virginia [20110]

MARK D. WOLFE  
d/b/a CITY COUNCIL MEMBER and Individually  
9027 Center Street  
Manassas, Virginia [20110]

RALPH D. SMITH  
d/b/a CITY COUNCIL MEMBER and Individually  
9027 Center Street  
Manassas, Virginia [20110]



IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

MATRIX FINANCIAL SERVICES  
CORPORATION,  
5151 CORPORATION DRIVE  
Troy, Michigan [48098]

JAMES K. CIROLI,  
d/b/a Vice President and Chief Executive Officer of  
FLAGSTAR BANK, and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]  
LEE MATTHEW SMITH, d/b/a Executive Vice President  
and Chief Operating Officer of FLAGSTAR BANK, and Individually  
5151 Corporate Drive  
Troy, Michigan [48098]

KRISTY WILLIAMS FARCHO  
d/b/a Vice President & President of Mortgage of  
FLAGSTAR BANK, and Individually  
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Troy, Michigan [48098]

DAVID L. URBAN  
d/b/a Vice President & Director of Investor Relations of  
FLAGSTAR, and Individually  
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Troy, Michigan [48098]

CHRIS BEATLEY d/b/a  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

PENNSYLVANIA DEPARTMENT OF BANKING  
AND SECURITIES

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CONSUMER FINANCIAL PROTECTION BUREAU (CFPB)  
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VANESSA ELLISON  
d/b/a LOAN ADMINISTRATION ANALYST and  
AGENT OF FLAGSTAR BANK and Individually  
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ALESSANDRO P. DINELLO  
d/b/a PRESIDENT AND CEO &  
DIRECTOR of  
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PENNSYLVANIA HUMAN RELATIONS COMMISSION  
Philadelphia Regional Office  
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OFFICE OF THE SHERIFF  
CITY and COUNTY of PHILADELPHIA  
-Allative Agents-  
LAND TITLE BUILDING  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

COMMONWEALTH LAND TITLE INSURANCE COMPANY  
601 Riverside Avenue  
Jacksonville, Florida [32204]

FIDELITY NATIONAL FINANCIAL, INC.  
Corporation Trust Center  
1209 Orange Street  
New Castle, Delaware [19801]

CONTINENTAL MUTUAL INSURANCE COMPANY  
8049 West Chester Pike  
Upper Darby, Pennsylvania [19083]

ASI INSURANCE COMPANY  
2 ASI Way  
St. Petersburg, Florida [33702]

THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA,  
OFFICE OF JUDICIAL RECORDS  
FOR FILING (AGENTS and AGENCIES)  
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PHILADELPHIA, PENNSYLVANIA COMMONWEALTH [19107]

PHELAN, HALLINAN DIAMOND & JONES, LLP  
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ONE PENN CENTER PLAZA  
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d/b/a Attorney Account ID 322412 and Individually  
PHELAN HALLLINAN DIAMOND & JONES  
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One Penn Center Plaza  
Philadelphia, Pennsylvania [19103]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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Agent of GRB LAW GROUP, and Individually  
1425 Spruce Street, Suite 100  
Philadelphia, Pennsylvania [19102]

GERALD J. POMERANTZ & ASSOCIATES  
21 S. 12th Street, 7<sup>th</sup> Floor  
Philadelphia, Pennsylvania [19107]

LINDA CARPENTER, d/b/a JUDGE for PHILADELPHIA  
COURT OF COMMON PLEAS and Individually  
1418 Criminal Justice Center,  
Philadelphia, Pennsylvania [19107]

FANTA SANOE  
6829 Guyer Avenue  
Philadelphia, Pennsylvania [19142]

IDEE C. FOX  
d/b/a JUDGE FOR THE COURT OF  
COMMON PLEAS and Individually  
656 City Hall  
Philadelphia, Pennsylvania [19107]

NIS-LAR LLC, and  
GUY LAREN d/b/a DEVELOPER and INDIVIDUALLY  
4323 Spruce Street  
Philadelphia, Pennsylvania [19104]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

YELENA SNIGUR  
d/b/a NOTARY PUBLIC IN PENNSYLVANIA  
and INDIVIDUALLY  
c/o PENNSYLVANIA DEPARTMENT OF  
STATE BUREAU OF COMMISSIONS  
Capital Park  
401 North Street  
Harrisburg, Pennsylvania [17101]

BANK OF NEW YORK MELLON  
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CHIEF FINANCIAL OFFICER and  
Robert Kelly and as INDIVIDUALS  
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BANK OF AMERICA  
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Charlotte, North Carolina [28255]

DITECH FINANCIAL LLC  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

WORCESTER COUNTY SHERIFF'S OFFICE  
and AGENTS  
240 Main Street  
Worcester, Massachusetts [01608]  
LEWIS G. EVANGELIDIS  
d/b/a SHERIFF OF WORCESTER COUNTY and  
INDIVIDUALLY  
240 Main Street  
Worcester, Massachusetts [01608]

WORCHESTER COUNTY CITY COUNCIL  
City Hall Room 206  
455 Main Street  
Worcester, Massachusetts [01608]

JOSEPH M. PETTY  
d/b/a MAYOR OF WORCHESTER COUNTY  
and COUNCILOR-AT-LARGE and  
INDIVIDUALLY  
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Worcester, Massachusetts [01605]

MORRIS A. BERGMAN  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
11 Kensington Heights  
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DONNA M. COLORIO  
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10 Homer Street  
Worcester, Massachusetts [01602]

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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GARY ROSEN  
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INDIVIDUALLY  
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KATHLEEN M. TOOMEY  
d/b/a COUNCILOR AT LARGE and  
INDIVIDUALLY  
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SEAN M. ROSE  
d/b/a DISTRICT 1 COUNCILOR and  
INDIVIDUALLY  
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Worcester, Massachusetts [01609]

CANDY F. MERO-CARLSON  
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INDIVIDUALLY  
42 Benedict Road  
Worcester, Massachusetts [01604]

GEORGE J. RUSSELL  
d/b/a DISTRICT 3 COUNCILOR and  
INDIVIDUALLY  
30 Dolly Drive  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

SARAI RIVERA  
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INDIVIDUALLY  
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INDIVIDUALLY  
DEPARTMENT OF RECORDS  
160 City Hall  
Philadelphia, Pennsylvania [19107]

MATTHEW E. WALLY  
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INDIVIDUALLY  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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ANTHONY N. RENZI d/b/a  
WALTER INVESTMENT MANAGEMENT CORP., and  
Gary L. Tillett, d/b/a as CHIEF FINANCIAL  
OFFICER OF WALTER INVESTMENT  
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COMMONWEALTH OF MASSACHUSETTS  
Charlie Baker,  
d/b/a GOVERNOR OF MASSACHUSETTS and  
INDIVIDUALLY  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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U.S. LIABILITY INSURANCE CO.  
1190 Devon Park Drive  
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UNITED STATES LIABILITY INSURANCE COMPANY (USLI)  
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UNIVERSITY OF PENNSYLVANIA  
AMY GUTMANN, d/b/a PRESIDENT of the  
UNIVERSITY OF PENNSYLVANIA and  
INDIVIDUALLY  
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IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

UNIVERSITY OF THE SCIENCES IN PHILADELPHIA  
PAUL KATZ, d/b/a PRESIDENT of  
UNIVERSITY OF THE SCIENCES IN PHILADELPHIA and  
INDIVIDUALLY  
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PREMIER TITLE COMPANY  
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and INDIVIDUALLY  
LAW OFFICES OF DAMIAN G. WALDMAN  
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DAMIAN G. WALDMAN d/b/a Attorney and INDIVIDUALLY  
LAW OFFICES OF DAMIAN G. WALDMAN  
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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
THE PHILADELPHIA COURTS  
LANDLORD TENANT COURT  
-All Agents and as INDIVIDUALS  
1339 Chestnut Street, Room 1020

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

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Woodbridge, Virginia [22193]

FEDERAL DEPOSIT INSURANCE CORPORATION  
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NEW YORK STATE BAR ASSOCIATION  
1 ELK STREET  
ALBANY, NEW YORK [12207]

Date of Execution: \_\_\_\_\_

By: \_\_\_\_\_

Autograph of living man or woman.

IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 202\_\_\_\_, upon acceptance, comprehension and consideration of this herein Complaint it is hereby ORDERED and DECREED that the APPLICATION FOR RELIEF is GRANTED along with REMEDY.

By THE COURT:

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J.